

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20090003
Agency Interest No. 1468

Ms. Michelle Eaglin
Environmental Engineering Manager
Rubicon LLC
Post Office Box 517
Geismar, LA 70734-0517

RE: Part 70 Operating Permit Renewal/Modification, Aniline Complex, Rubicon LLC, Geismar, Ascension Parish, Louisiana

Dear Ms. Eaglin:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2010.

Public
NOTICE

c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Aniline Complex
Agency Interest No.: 1468
Rubicon LLC
Geismar, Ascension Parish, Louisiana**

I. Background

Rubicon LLC is a chemical manufacturer of a variety of organic and inorganic chemicals at their Geismar Facility and has been in operation since 1966. Aniline Complex consists of the Nitrobenzene I, Nitrobenzene II, Aniline II, and Aniline III production units. The facility currently operates under Permit No. 2261-V3, issued on July 9, 2008.

This is the Part 70 operating permit for the facility.

II. Origin

A permit application dated February 16, 2009, was submitted requesting a Part 70 operating permit renewal/modification.

III. Description

The Aniline Complex consists of the Nitrobenzene I and II, and Aniline II and III production units. This is a Synthetic Organic Chemical Manufacturing Industry (SOCMI) chemical manufacturing process unit (CMPU) which produces Nitrobenzene and Aniline.

Nitrobenzene Process

Nitrobenzene is produced at Rubicon by nitrating benzene in the presence of a large volume of mixed acid in a series of nitrators. Additional functional systems involved in the production of nitrobenzene include sulfuric acid concentrators to reconcentrate sulfuric acid, washers to remove water-soluble salts, a vent system benzene stripper to remove excess benzene from the product, a nitrogen oxides (NO_x) column to scrub NO_x formed in the process, a benzene scrubber to absorb benzene in the vent gas and a centrifuge unit for maximum removal of water from the product.

Aniline Process

Aniline is produced at Rubicon by reacting nitrobenzene and hydrogen in the presence of powdered nickel catalyst to form crude aniline. Additional functional systems involved in the production of aniline include a dehydration section to remove impurities that boil at low temperature, a refining section to remove impurities that boil at high temperature, a purge still section where aniline is recovered from the wet and dry residue streams, an amine water/vent scrubber system to recover nitrobenzene and aniline from the wastewater streams and a boiler to incinerate waste gaseous and liquid waste streams.

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The proposed modifications for the Aniline Complex are as follows:

1. Move the Sulfuric Acid Pump Tanks (MS-2120A-B/EQT058, MS-2720/EQT1097), and the Wash Water Tank (MF-2100/EQT1057) to insignificant activities;
2. Revise the maximum design capacity of insignificant activity source YB from 55 gallons to 110 gallons;
3. Revise the maximum design capacity of insignificant activity source QJ from 564 gallons to 1500 gallons;
4. Add the VOC separator, Dry NB Coalescer Separator (GY-2186/EQT1215), as a listed source;
5. Add surge vessels, MS-2159/EQT1207, MS-2725/EQT1208, MS-2511/EQT1209, MS-2524/EQT1210, MS-2227/EQT1211, MS-2251/EQT1212, MS-2231/EQT1213, and MS-2224/EQT1214 as listed sources;
6. Add five demounts, Eurotrainers A, B,C, D, and E, as insignificant activities;
7. Combine Aniline Complex Wastewater (EQT1130), Maintenance Wastewater (EQT1131) and Benzene-Containing Wastewater (EQT1132) as one listed source, Aniline Complex Wastewater (EQT1130); and
8. Revise the fugitive emissions for the Aniline Complex (Emission Point QD/FUG0028).

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	21.79	21.79	-
SO ₂	-	-	-
NO _x	277.49	277.14	- 0.35
CO	5.93	5.93	-
VOC	35.43	34.87	- 0.56

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LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Ammonia	2.41	2.41	-
Aniline	12.34	9.86	- 2.48
Benzene	14.86	15.67	+ 0.81
Chlorine	0.03	0.03	-
Chlorinated Dibenzo Furans	0.001	0.001	-
Chlorinated Dibenzo-P-Dioxins	0.001	<0.001	-
Hydrochloric Acid	0.02	0.02	-
Nitrobenzene	4.58	5.49	+ 0.91
Phenol	0.15	0.14	- 0.01
Ortho-Toluidine	0.06	0.06	-
Total	34.45	33.68	- 0.77

Other Non-Tap VOC:

1.19

<u>** Metals:</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Antimony (and Compounds)	0.01	0.01	-
Arsenic (and Compounds)	0.002	0.002	-
Barium (and Compounds)	0.01	0.01	-
Beryllium	0.002	0.002	-
Cadmium (and Compounds)	0.002	0.002	-
Chromium VI (and Compounds)	0.002	0.002	-
Lead	0.004	0.004	-
Mercury (and Compounds)	0.001	0.001	-
Nickel (and Compounds)	1.80	1.80	-
Silver	0.002	0.002	-
Thallium	0.004	0.004	-

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IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) do not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in The Advocate, Baton Rouge, on XX, 2010, and in the Gonzales Weekly, Ascension, on XX, 2010, and submitted to the Ascension Parish Library, Gonzales Branch, on XX, 2010. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on XX, 2010. The draft permit was also submitted to US EPA Region VI on XX, 2010. All comments will be considered prior to the final permit decision.

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VII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS.

Dispersion Model Used: ISC2 (Screen) and ISCST2

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Aniline	8-hour	19.9257 $\mu\text{g}/\text{m}^3$	181.00 $\mu\text{g}/\text{m}^3$
Benzene	8-hour	2.7338 $\mu\text{g}/\text{m}^3$	12.00 $\mu\text{g}/\text{m}^3$
Nickel	8-hour	0.1148 $\mu\text{g}/\text{m}^3$	0.21 $\mu\text{g}/\text{m}^3$
Antimony	8-hour	0.0112 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$
Chromium (VI)	8-hour	0.0005 $\mu\text{g}/\text{m}^3$	0.01 $\mu\text{g}/\text{m}^3$
Nitrobenzene	8-hour	6.4792 $\mu\text{g}/\text{m}^3$	119.00 $\mu\text{g}/\text{m}^3$
Barium	8-hour	0.0023 $\mu\text{g}/\text{m}^3$	11.90 $\mu\text{g}/\text{m}^3$

VIII. General Condition XVII Activities

Work Activity	Schedule	Emission Rates – tons per year					
		PM ₁₀	SO ₂	NO _x	CO	VOC	NH ₃
NB-I Benzene Scrubber	Fan: 3 times/yr	-	-	0.15	-	0.50	-
AS-2113 Maintenance	Chiller: 2 times/yr	-	-	-	-	-	-
NB-II Benzene Scrubber	Fan: 3 times/yr	-	-	0.18	-	0.06	-
AS-2713 Maintenance	Chiller: 2 times/yr	-	-	-	-	-	-
Aniline Reactor Purging	84 hrs/yr	-	-	-	Neg	0.17	0.02
Aniline II Vent Scrubber Maintenance	336 hrs/yr	-	-	-	-	0.43	-
Workup Reactor Purging	60 hrs/yr	-	-	-	-	0.22	-

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IX. Insignificant Activities

ID No.:	Description	Citation
PB	NB-I Sulfuric Acid Storage Tank MS-2402 (10,152 gallons)	LAC 33:III.501.B.5.D
PF	NB-I Drain Tank MS-2114 (14,219 gallons)	LAC 33:III.501.B.5.D
PJ	NB-I Catch Pot MS-2142 (470 gallons)	LAC 33:III.501.B.5.D
QJ	Aniline II Soap Tank – Super Chem 108 Cleaner (1500 gallons)	LAC 33:III.501.B.5.A.3
YB	Aniline Soap Tanks – ATS Cleaner (110 gallons)	LAC 33:III.501.B.5.A.3
MS-2120A	Sulfuric Acid Pump Tank (20,000 gallons)	LAC 33:III.501.B.5.D
MS-2120B	Sulfuric Acid Pump Tank (20,000 gallons)	LAC 33:III.501.B.5.D
MS-2720	Sulfuric Acid Pump Tank (10,000 gallons)	LAC 33:III.501.B.5.D
MF-2100	Wash Water Tank (29,693 gallons)	LAC 33:III.501.B.5.D
N/A	Demounts (Eurotrainers A, B, C, D, and E) (6,000 gallons each)	LAC 33:III.501.B.5.D

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III. Chapter																		
		5 ^A	509	9	11	13	15	2103	2107	2109	2111	2115	2147	2122	2153	29*	51*	53*	56	59*
UNF0003	Aniline Complex	1		1							1						1		1	1
EQT1035	OB - Nitric Acid Vent Scrubber AS-1417																			
EQT1036	PA - NB-I Benzene Scrubber AS-2113										2	2								
EQT1037	PC - NB-I Loading/Unloading							3												
EQT1038	QA - Aniline-II Vent Scrubber AS-2203										2	2								
EQT1039	QB - Aniline-II Boiler HN-2201			1	1	2														
EQT1040	QC - Aniline-II Loading/Unloading							3												
EQT1041	QL - Aniline II Wet Purge Still Residue Loading							3												
EQT1042	QM - Aniline II Dry/Reactor Purge Still Residue Loading							3												
EQT1043	XA - NB II Benzene Scrubber AS-2713											2	2							
EQT1044	YA - Aniline-III Vent Scrubber AS-2503											2	2							
EQT1045	YE - Aniline-II Vent KO Drum MS-2223								3											
EQT1046	MR-2108 A-F - NB I Nitratractor Reactor System											2	2							
EQT1047	MF-1455A - Nitric Acid Storage Tank								3											
EQT1048	MF-1455B - Nitric Acid Storage Tank								3											
EQT1049	MF-1401C - Nitric Acid Storage Tank								3											
EQT1050	MT-2401 - Benzene Storage Tank								1											
EQT1051	MT-2404 - Nitrobenzene Storage Tank								3											
EQT1052	MF-2437 - Dry Nitrobenzene Storage Tank								3											
EQT1053	MT-2217A/B - Aniline Test Tanks								3											
EQT1054	MT-2405 - Nitrobenzene Bulk Storage Tank								3											

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		5 ^A	509	9	11	13	15	2103	2107	2109	2111	2115	2147	2122	2153	29*	51*	53*	56	59*	
EQT1055	MT-2406 - Aniline Bulk Storage Tank							3													
EQT1056	MT-2500 - Aniline Bulk Storage Tank							3													
EQT1059	MF-2700 - NB Stripper Feed Tank							3													
EQT1060	MS-2209 - Crude Aniline Storage							3													
EQT1061	MF-2240 - Aniline Rework Tank							3													
EQT1062	MS - 2207 - Reactor Residue Vessel							1													
EQT1063	MS-2241 - Reactor Residue Recovery Vessel							3													
EQT1064	MS-2509 - Crude Aniline Storage							1													
EQT1065	MS-2555 - Amine Water Stripper Feed							3													
EQT1066	GY-2187 - Dry NB Weir Pot							3													
EQT1067	MM-2101 - Centrifuge Overflow Pot							3													
EQT1068	MM-2246 - Aniline Separator Hold Pot							3													
EQT1069	MM-2701A/B/C - Centrifuge Overflow Pots							3													
EQT1070	MS-2101 - Nitric Acid Pump Tank							3													
EQT1071	MS-2103 - Benzene Pump Tank							1													
EQT1072	MS-2105 - Crude NB Interim Tank							3													
EQT1073	MS-2106 - NB Pump Tank							3													
EQT1074	MS-2108 - NB Overflow Tank							3													
EQT1075	MS-2125 - Barometric Seal Tank																				
EQT1076	MS-2169 - Centrifuged NB Tank							3													
EQT1077	MS-2171 - Washed NB Pump Tank							3													
EQT1078	MS-2172 - NB Condensate Separator							3													

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ID No.:	Description	LAC 33:III. Chapter																			
		5 ^A	509	9	11	13	15	2103	2107	2109	2111	2115	2147	2122	2153	29*	51*	53*	56	59*	
EQT1142	PE-2124A/B - Water Heat Exchanger																				
EQT1143	TT-2186 - Water Heat Exchanger																				
EQT1144	TT-2187 - Water Heat Exchanger																				
EQT1145	TT-2217A/B - Water Heat Exchanger																				
EQT1146	TT-2203A/B - Water Heat Exchanger																				
EQT1147	TT-2202 - Water Heat Exchanger																				
EQT1148	TT-2256 - Water Heat Exchanger																				
EQT1149	TT-2218 - Water Heat Exchanger																				
EQT1150	TT-2258 - Water Heat Exchanger																				
EQT1151	TT-2211 - Water Heat Exchanger																				
EQT1152	MM-2250 - Water Heat Exchanger																				
EQT1153	TT-2706 - Water Heat Exchanger																				
EQT1154	TT-2724A/B - Water Heat Exchanger																				
EQT1155	TT-2754 - Water Heat Exchanger																				
EQT1156	TT-2761 - Water Heat Exchanger																				
EQT1157	TT-2762 - Water Heat Exchanger																				
EQT1158	TT-2779 - Water Heat Exchanger																				
EQT1159	TT-2786A/B - Water Heat Exchanger																				
EQT1160	TT-2517A - Water Heat Exchanger																				
EQT1161	TT-2503A - Water Heat Exchanger																				
EQT1162	TT-2502 - Water Heat Exchanger																				
EQT1163	TT-2556 - Water Heat Exchanger																				

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ID No.:	Description	LAC 33:III.Chapter																			
		5 ^A	509	9	11	13	15	2103	2107	2109	2111	2115	2147	2122	2153	29*	51*	53*	56	59*	
EQT1164	TT-2518 - Water Heat Exchanger																				
EQT1165	TT-2558A/S - Water Heat Exchanger																				
EQT1166	TT-2506A/S - Water Heat Exchanger																				
EQT1167	TT-2511 - Water Heat Exchanger																				
EQT1168	TT-2546 - Water Heat Exchanger																				
EQT1169	TT-2247 - Water Heat Exchanger																				
EQT1170	TT-2179 - Water Heat Exchanger																				
EQT1173	PE-2724A/B - Water Heat Exchanger																				
EQT1175	TT-2259 - Water Heat Exchanger																				
EQT1176	TT-2206 - Water Heat Exchanger																				
EQT1177	TT-2502 - Water Heat Exchanger																				
EQT1178	MM-215 - Water Heat Exchanger																				
EQT1179	TT-2257 - Water Heat Exchanger																				
EQT1180	TT-2163A/B - Water Heat Exchanger																				
EQT1181	TT-2240A/B - Water Heat Exchanger																				
EQT1182	TT-2215 - Water Heat Exchanger																				
EQT1183	TT-2240A/B - Water Heat Exchanger																				
EQT1184	TT-2736 - Water Heat Exchanger																				
EQT1185	TT-2741 - Water Heat Exchanger																				
EQT1186	TT-2243 - Water Heat Exchanger																				
EQT1187	TT-2764 - Water Heat Exchanger																				
EQT1188	TT-2543 - Water Heat Exchanger																				

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III. Chapter																			
		5 ^A	509	9	11	13	15	2103	2107	2109	2111	2115	2147	2122	2153	29*	51*	53*	56	59*	
EQT1189	TT-2111A - Water Heat Exchanger																				
EQT1190	TT-2402 - Water Heat Exchanger																				
EQT1207	MS-2159 - Surge Vessel					3											1				
EQT1208	MS-2725 - Surge Vessel					3											1				
EQT1209	MS-2511 - Surge Vessel					3											1				
EQT1210	MS-2524 - Surge Vessel					3											1				
EQT1211	MS-2227 - Surge Vessel					3											1				
EQT1212	MS-2251 - Surge Vessel					3											1				
EQT1213	MS-2231 - Surge Vessel					3											1				
EQT1214	MS-2224 - Surge Vessel					3											1				
EQT1215	GY-2186 - Dry NB Coalescer Separator								1								1				
EQT1216	TT-2163A/B - Water Heat Exchanger																1				
EQT1217	GR-2141 - Water Heat Exchanger																1				
EQT1218	TT-2215 - Water Heat Exchanger																1				
EQT1219	TT-2240A/B - Water Heat Exchanger																1				
EQT1240	TT-2760 - Water Heat Exchanger																1				
EQT1267	MR-2202 - Aniline II Workup Reactor										2	2					1				
EQT1268	MR-2503 - Aniline III Workup Reactor										2	2					1				
FUG0028	QD - Aniline Complex Fugitive Emissions												1				1				
FUG0029	QF - Aniline-II Cooling Tower Fugitives																1				
FUG0030	YF - Wastewater System Fugitives														2		1				

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KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61										40 CFR 63 NESIIAP									
		A	G	K	Kb	Db	Dc	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	EEE	Q	H	FFFF	68	82							
UNF0003	Aniline Complex	1																													
EQT1035	OB - Nitric Acid Vent Scrubber AS-1417		3																												
EQT1036	PA - NB-I Benzene Scrubber AS-2113																														
EQT1037	PC - NB-I Loading/Unloading																														
EQT1038	QA - Aniline-II Vent Scrubber AS-2203						3																								
EQT1039	QB - Aniline-II Boiler HN-2201			2	2																										
EQT1040	QC - Aniline-II Loading/Unloading																														
EQT1041	QL - Aniline II Wet Purge Still Residue Loading																														
EQT1042	QM - Aniline II Dry/Reactor Purge Still Residue Loading																														
EQT1043	XA - NB II Benzene Scrubber AS-2713						1																								
EQT1044	YA - Aniline-III Vent Scrubber AS-2503						1																								
EQT1045	YE - Aniline-II Vent KO Drum MS-2223			3																											
EQT1046	MR-2108 A-F - NB I Nitrator Reactor System								1																						
EQT1047	MF-1455A - Nitric Acid Storage Tank			3																											
EQT1048	MF-1455B - Nitric Acid Storage Tank			3																											
EQT1049	MF-1401C - Nitric Acid Storage Tank			3																											
EQT1050	MT-2401 - Benzene Storage Tank		1																												
EQT1051	MT-2404 - Nitrobenzene Storage Tank			3																											
EQT1052	MF-2437 - Dry Nitrobenzene Storage Tank			1																											
EQT1053	MT-2217A/B - Aniline Test Tanks			3																											
EQT1054	MT-2405 - Nitrobenzene Bulk Storage Tank			3																											

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ID No.:	Description	40 CFR 60 NSPS										40 CFR 61							40 CFR 63 NESHAP								
		A	G	K	Kb	Db	Dc	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	EEE	Q	H	H	FFF	FFF	FFF	FFF	
EQT1055	MT-2406 - Aniline Bulk Storage Tank				1																						
EQT1056	MT-2500 - Aniline Bulk Storage Tank				1																						
EQT1059	MF-2700 - NB Stripper Feed Tank				3																						
EQT1060	MS-2209 - Crude Aniline Storage				3																						
EQT1061	MF-2240 - Aniline Rework Tank				3																						
EQT1062	MS - 2207 - Reactor Residue Vessel				3																						
EQT1063	MS-2241 - Reactor Residue Recovery Vessel				3																						
EQT1064	MS-2509 - Crude Aniline Storage				3																						
EQT1065	MS-2555 - Amine Water Stripper Feed				3																						
EQT1066	GY-2187 - Dry NB Weir Pot				3																						
EQT1067	MM-2101 - Centrifuge Overflow Pot				3																						
EQT1068	MM-2246 - Aniline Separator Hold Pot				3																						
EQT1069	MM-2701A/B/C - Centrifuge Overflow Pots				3																						
EQT1070	MS-2101 - Nitric Acid Pump Tank				3																						
EQT1071	MS-2103 - Benzene Pump Tank				3																						
EQT1072	MS-2105 - Crude NB Interim Tank				3																						
EQT1073	MS-2106 - NB Pump Tank				3																						
EQT1074	MS-2108 - NB Overflow Tank				3																						
EQT1075	MS-2125 - Barometric Seal Tank																										
EQT1076	MS-2169 - Centrifuged NB Tank				3																						
EQT1077	MS-2171 - Washed NB Pump Tank				3																						
EQT1078	MS-2172 - NB Condensate Separator				3																						
EQT1079	MS-2205 - Aniline Let Down Drum				3																						

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61							40 CFR 63 NESHAP						
		A	G	K	Kb	Db	Dc	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	EEE	Q	H	I	FFFF	68	82
EQT1080	MS-2206 - Amine Water Let Down Drum				3																				
EQT1081	MS-2210A/B - Weir Boxes				3																				
EQT1082	MS-2213 - Semi-refined Tank				3																				
EQT1083	MS-2219 - Amine Water Tank				3																				
EQT1084	MS-2221 - Wet Purge Tank				3																				
EQT1085	MS-2222 - Dry Purge Tank				3																				
EQT1086	MS-2229 - Weak CHA Tank				3																				
EQT1087	MS-2230 - Wet Purge Residue Tank				3																				
EQT1088	MS-2242 - Amine Water Pump Tank				3																				
EQT1089	MS-2246 - Benzene Recycle Tank (Alternative Operating Scenario)				3																				
EQT1090	MM-2249 - DH O/H Separator Weir Pot				3																				
EQT1091	MS-2505 - Aniline Let Down Drum				3																				
EQT1092	MS-2506 - MS-2506 - Amine Water Let Down Drum				3																				
EQT1093	MS-2510A - Reactor Binary Separator Weir Box				3																				
EQT1094	MS-2513 - Semi-refined Tank				3																				
EQT1095	MS-2701 - Nitric Acid Pump Tank				3																				
EQT1096	MS-2703 - Benzene Pump Tank				3																				
EQT1098	MS-2769 - Product Pump Tank				3																				
EQT1099	MS-2772 - NB Condensate Separator				3																				
EQT1100	MS-2151 & MS-2155 - Wash Sys Reactor System																								
EQT1101	MR-2203 - Methanation Converter Reactor System																								
EQT1102	MR-2201 A/B - Aniline II Reactor System																								

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61					40 CFR 63 NESHAP								
		A	G	K	Kb	Db	De	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	EEE	Q	II	FFFF	68	82	
EQT1103	MR-2708A/L - NB II Nitrator Train 1																								
EQT1104	MR-2709A/L - NB II Nitrator Train 2																								
EQT1105	GY-2734/5/6 - NB II Washer Contactors																								
EQT1106	MR-2501A - Aniline III Reactor System																								
EQT1107	AS-2168 - NB I Bz Stripping Distillation System									3															
EQT1108	AS-2167 - NB II Effluent Stripping Distillation System									3															
EQT1109	GE-2122 - NB I Sulfuric Acid Concentrator Distillation System									3															
EQT1110	AS-2202 - Aniline II Dehydration Distillation System									3															
EQT1111	MS-2248 - Aniline II Amine Water Extract Distillation System									3															
EQT1112	AS-2204 - Aniline II Refining Column Distillation System									3															
EQT1113	AS-2206 - Aniline II Amine Water Stripper Distillation System									3															
EQT1114	AS-2210 - Purge Still Distillation System									3															
EQT1115	GE-2722 - NB II Sulfuric Acid Flash Evaporator Distillation System									1															
EQT1116	AS-2768 - NB II Benzene Stripping Distillation System									1															
EQT1117	AS-2767 - NB II Effluent Stripping Distillation System									1															
EQT1118	AS-2502 - Aniline III Dehydration Distillation System									1															
EQT1119	AS-2504 - Aniline III Refining Column Distillation System									1															

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS							40 CFR 61							40 CFR 63 NESHAP								
		A	G	K	Kb	Db	Dc	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	EEE	Q	II	FFFF	68	82
EQT1120	AS-2506 - Aniline III Amine Water Stripper Distillation System							1																
EQT1121	AS-2510 - Dry Purge Still Distillation System							3																
EQT1127	GS-2786A/S - VOC / Water Separators																							
EQT1128	GS-2186 - VOC / Water separator																							
EQT1129	GS-2187 - Centrifugal Separator																							
EQT1130	Aniline Complex Waste-water																							
EQT1133	AS-2136 - NOx Absorption Column							3																
EQT1134	AS-2736 - NOx Scrubber							1																
EQT1135	TT-2166 - NB Product Exchanger																							
EQT1136	TT-2219A/B Refined Aniline Product Coolers																							
EQT1137	TT-2519A/B Refined Still Product Coolers																							
EQT1138	TT-2179 - Water Heat Exchanger																							
EQT1139	TT-2162 - Water Heat Exchanger																							
EQT1140	TT-2106A/B - Water Heat Exchanger																							
EQT1141	TT-2161 - Water Heat Exchanger																							
EQT1142	PE-2124A/B - Water Heat Exchanger																							
EQT1143	TT-2186 - Water Heat Exchanger																							
EQT1144	TT-2187 - Water Heat Exchanger																							
EQT1145	TT-2217A/B - Water Heat Exchanger																							
EQT1146	TT-2203A/B - Water Heat Exchanger																							
EQT1147	TT-2202 - Water Heat Exchanger																							
EQT1148	TT-2256 - Water Heat Exchanger																							

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61							40 CFR 63 NESHAP						
		A	G	K	Kb	Db	Dc	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	EEE	Q	H	FFF	68	82	
EQT1149	TT-2218 - Water Heat Exchanger																								
EQT1150	TT-2258 - Water Heat Exchanger																								
EQT1151	TT-2211 - Water Heat Exchanger																								
EQT1152	MM-2250 - Water Heat Exchanger																								
EQT1153	TT-2706 - Water Heat Exchanger																								
EQT1154	TT-2724A/B - Water Heat Exchanger																								
EQT1155	TT-2754 - Water Heat Exchanger																								
EQT1156	TT-2761 - Water Heat Exchanger																								
EQT1157	TT-2762 - Water Heat Exchanger																								
EQT1158	TT-2779 - Water Heat Exchanger																								
EQT1159	TT-2786A/B - Water Heat Exchanger																								
EQT1160	TT-2517A - Water Heat Exchanger																								
EQT1161	TT-2503A - Water Heat Exchanger																								
EQT1162	TT-2502 - Water Heat Exchanger																								
EQT1163	TT-2536 - Water Heat Exchanger																								
EQT1164	TT-2518 - Water Heat Exchanger																								
EQT1165	TT-2558A/S - Water Heat Exchanger																								
EQT1166	TT-2506A/S - Water Heat Exchanger																								
EQT1167	TT-2511 - Water Heat Exchanger																								
EQT1168	TT-2546 - Water Heat Exchanger																								
EQT1169	TT-2247 - Water Heat Exchanger																								
EQT1170	TT-2179 - Water Heat Exchanger																								
EQT1173	PE-2724A/B - Water Heat Exchanger																								

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61							40 CFR 63 NESHAP								
		A	G	K	Kb	Db	Dc	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	BEE	Q	H	H	FFF	F	H		
EQT1175	TT-2259 - Water Heat Exchanger																										
EQT1176	TT-2206 - Water Heat Exchanger																										
EQT1177	TT-2502 - Water Heat Exchanger																										
EQT1178	MM-215 - Water Heat Exchanger																										
EQT1179	TT-2257 - Water Heat Exchanger																										
EQT1180	TT-2163A/B - Water Heat Exchanger																										
EQT1181	TT-2240A/B - Water Heat Exchanger																										
EQT1182	TT-2215 - Water Heat Exchanger																										
EQT1183	TT-2240A/B - Water Heat Exchanger																										
EQT1184	TT-2736 - Water Heat Exchanger																										
EQT1185	TT-2741 - Water Heat Exchanger																										
EQT1186	TT-2243 - Water Heat Exchanger																										
EQT1187	TT-2764 - Water Heat Exchanger																										
EQT1188	TT-2543 - Water Heat Exchanger																										
EQT1189	TT-2111A - Water Heat Exchanger																										
EQT1190	TT-2402 - Water Heat Exchanger																										
EQT1207	MS-2159 - Surge Vessel						3																				
EQT1208	MS-2725 - Surge Vessel						3																				
EQT1209	MS-2511 - Surge Vessel						3																				
EQT1210	MS-2524 - Surge Vessel						3																				
EQT1211	MS-2227 - Surge Vessel						3																				
EQT1212	MS-2251 - Surge Vessel						3																				
EQT1213	MS-2231 - Surge Vessel						3																				

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS										40 CFR 61							40 CFR 63 NESHAP						
		A	G	K	Kb	Db	Dc	NNN	RRR	VV	A	J	V	Y	FF	A	F	G	EEE	Q	H	FFF	FF	82	
EQT1214	MS-2224 - Surge Vessel				3																				
EQT1215	GY-2186 - Dry NB Coalescer Separator																								
EQT1216	TT-2163A/B - Water Heat Exchanger																								
EQT1217	GR-2141 - Water Heat Exchanger																								
EQT1218	TT-2215 - Water Heat Exchanger																								
EQT1219	TT-2240A/B - Water Heat Exchanger																								
EQT1240	TT-2760 - Water Heat Exchanger																								
EQT1267	MR-2202 - Aniline II Workup Reactor																								
EQT1268	MR-2503 - Aniline III Workup Reactor																								
FUG0028	QD - Aniline Complex Fugitive Emissions																								
FUG0029	QF - Aniline-II Cooling Tower Fugitives																								
FUG0030	YF - Wastewater System Fugitives																								

KEY TO MATRIX

- 1 - The regulations have applicable requirements which apply to this particular emission source.
- 2 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to recordkeeping, or reporting, requirements.
- 3 - The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- Blank - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1035/OB: Nitric Acid Vent Scrubber AS-1417	NSPS Subpart G – Nitric Acid Plants [40 CFR 60.70]	DOES NOT APPLY - Facility does not manufacture nitric acid. (40 CFR 60.71 (a)).
EQT1036/PA: NB-I Benzene Scrubber AS-2113	Waste Gas Disposal [LAC 33:III.2115] Limiting VOC Emissions from SOCM I Reactor and Distillation Operations [LAC 33:III.2147]	EXEMPT - Meet an exemption in another section of Chapter 2 I. (LAC: 33.2147.A.2.g) EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g)
EQT1037/PC: NB-I Loading/Unloading	Volatile Organic Compounds – Loading [LAC 33:III.2147]	DOES NOT APPLY – Vapor pressure < 1.5 psia at loading conditions (LAC 33:III.2107.A).
EQT1038/QA: Aniline-II Vent Scrubber AS-2203	NSPS Subpart NNN – SOCM I Distillation Processes [40 CFR 60.660]	DOES NOT APPLY – Constructed before December, 1983. (40 CFR 60.660.b)
	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT – Meets an exemption in another section of Chapter 2 I. (LAC 33:III.2147.A.2.g)
	Limiting VOC Emissions from SOCM I Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT1039/QB: Aniline-II Boiler HN-2201	NSPS Subpart Db - Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b] NSPS Subpart Dc - Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b] Emissions for Fuel Burning Equipment [LAC 33:III.1313]	EXEMPT - Heat input rate < 100,000,000 BTU/hour (40 CFR 60.40b(a)) EXEMPT - Constructed prior to June 9, 1989 (40 CFR 60.40c(a))
EQT1040/QC: Aniline-II Loading/Unloading	Emissions Standards for Sulfur Dioxide [LAC 33: III. Chapter 15] Volatile Organic Compounds - Loading [LAC 33:III.2107]	DOES NOT APPLY - Primary purpose is not to produce steam, hot water, hot air or other indirect of liquids, solids or gases. Primary purpose is as a hazardous waste incinerator. EXEMPT - Site wide emissions of sulfur compounds < 250 tons/yr. (LAC 33: III.1503.C)
EQT1041/QL: Aniline II Wet Purge Still Residue Loading	Volatile Organic Compounds - Loading [LAC 33:III.2107]	DOES NOT APPLY - Vapor pressure < 1.5 psia at loading conditions (LAC33:III.2107.A).
EQT1042/QM: Aniline II Dry/Reactor Purge Still Residue Loading	Volatile Organic Compounds - Loading [LAC 33:III.2107]	DOES NOT APPLY - Less than 20,000 gallons/day VOC with vapor pressure greater than 1.5 psia loaded per day (average over any 30 days period). DOES NOT APPLY - Less than 20,000 gallons/day VOC with vapor pressure greater than 1.5 psia loaded per day (average over any 30 days period).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1043/XA: NB II Benzene Scrubber AS-2713	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT – Meets an exemption in another section of Chapter 21 (LAC 33:III.2147.A.2.g)
EQT1044/YA - Aniline-III Vent Scrubber AS-2503	Limiting VOC Emissions from SOCM I Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g)
EQT1046/MR-2108 A- F - NB I Nitrator Reactor System	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT – Meets an exemption in another section of Chapter 21 (LAC 33:III.2147.A.2.g)
EQT1045/YE: Aniline-II Vent KO Drum MS-2223	Limiting VOC Emissions from SOCM I Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g)
EQT1051/MT-2404: Nitrobenzene Storage Tank	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid [40 CFR 60.110b] Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Capacity < 19,813 gallons (40 CFR 60.111b(a)). DOES NOT APPLY – Vapor pressure < 1.5 psi (LAC 33:III.2103.A).
	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Constructed before July 23, 1984 (40 CFR 60.110b(a)). DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103.A).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1052/MF-2407: Dry Nitrobenzene Storage Tank	Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A).
EQT1053/MT- 2217A/B: Aniline Test Tanks	Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A).
EQT1054/MT-2405: Nitrobenzene Bulk Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid (40 CFR 60.110b) Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Constructed before July 23, 1984 (40 CFR 60.110b(a)). DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A).
EQT1055/MT-2406: Nitrobenzene Bulk Storage Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid (40 CFR 60.110b) Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Constructed before July 23, 1984 (40 CFR 60.110b(a)). DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A).
EQT1056/MT-2500: Aniline Bulk Storage Tank	Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1047/MF-1455A EQT1048/MF-1455B EQT1049/MF1401C	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b]	DOES NOT APPLY – Do not store a VOC.
Nitric Acid Storage Tanks	Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Do not store a VOC.
EQT1071/MS-2103, EQT1082/MS-2219, EQT1085/MS-2222,	NESHAP for source Categories – Subparts F and G Storage Vessel Provisions [40 CFR 63.100 and 63.119]	DOES NOT APPLY – Tanks do not store a HON regulated organic HAP.
EQT1086/MS-2229, EQT1087/MS-2230, EQT1094/MS-2513, EQT1096/MS-2703	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b]	DOES NOT APPLY – Capacity < 19,813 gallons (40 CFR 60.110b(a)).
Tanks	NESHAP for Source Categories Subparts F and H – Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY – Capacity < 19,812 gallons (40 CFR 63.170, Table 2)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT1072/MS-2105	NSPS Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] Storage of VOC Compounds [LAC 33:III.2103] NESHAP for Source Categories Subparts F and H - Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY - Capacity < 19,813 gallons (40 CFR 60.110b(a)).
EQT1073/MS-2106		
EQT1074/MS-2108		
EQT1076/MS-2169		
EQT1077/MS-2171		
EQT1078/MS-2172		
EQT1091/MS-2505	NSPS Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] Storage of VOC Compounds [LAC 33:III.2103] NESHAP for Source Categories Subparts F and H - Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY - Vapor pressure < 1.5 psia (LAC 33:III.2103 A).
EQT1098/MS-2769		
EQT1099/MS-2772		
Tanks		
EQT1066/GY-2187		
EQT1067/MM-2101		
EQT1068/MM-2246	DOES NOT APPLY - Capacity < 19,813 gallons (40 CFR 60.110b(a)).	
EQT1069/MM-2701A/B/C		
EQT1090/MM-2249		
		DOES NOT APPLY - Volume < 250 gallons.
		DOES NOT APPLY - Capacity < 19,812 gallons (40 CFR 63.170, Table 2).

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT1070/MS-2101 Nitric Acid Pump Tank	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] Storage of VOC Compounds [LAC 33:III.2103] NESHAP for Source Categories Subparts F and H – Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY – Capacity < 19,813 gallons (40 CFR 60.110b(a)). DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A). DOES NOT APPLY – Capacity < 19,812 gallons (40 CFR 63.170, Table 2)
EQT1060/MS-2209 EQT1065/MS-2555 Tanks	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] Storage of VOC Compounds [LAC 33:III.2103] NESHAP for Source Categories Subparts F and H – Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY – Capacity > 39,890 gallons with a vapor pressure < 0.51 psia (40 CFR 60.110b(b)). DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A). DOES NOT APPLY – Capacity > 39,890 gallons, vapor pressure < 0.75 psia (40 CFR 63.170 Table 2)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1061/MF-2240 EQT1063/MF-2241 Tanks	Storage of VOC Compounds [LAC 33:III.2103] NPS Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] NESHAP for Source Categories Subparts F and H - Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY - Vapor pressure < 1.5 psia (LAC 33:III.2103 A). DOES NOT APPLY - 19,813 gallons < vessel capacity < 39,890 gallons, vapor pressure < 2.17 psia (40 CFR 60.110b(b)). DOES NOT APPLY - 19,813 gallons < vessel capacity < 39,890 gallons, vapor pressure < 1.9 psia (40 CFR 63.170 Table 2).
EQT1059/MS-2700, EQT1083/MS-2219, EQT1084/MS-2221, EQT1088/MS-2242, EQT1095/MS-2701 Storage Tanks	Storage of VOC Compounds [LAC 33:III.2103] NPS Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] NESHAP for Source Categories Subparts F and H - Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY - Vapor pressure < 1.5 psia (LAC 33:III.2103 A). DOES NOT APPLY - Capacity < 19,813 gallons (40 CFR 60.110b(a)). DOES NOT APPLY - Capacity < 19,813 gallons (40 CFR 63.170, Table 2).
EQT1062/MS-2207, EQT1064/MS2509 EQT1089/MS-2246 Storage Tanks	NPS Subpart Kb - Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b] NESHAP for Source Categories Subparts F and H - Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY - Capacity < 19,813 gallons (40 CFR 60.110b(a)). DOES NOT APPLY - Capacity < 19,813 gallons (40 CFR 63.170, Table 2).

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Aniline Complex
 Agency Interest No.: 1468
 Rubicon LLC
 Geismar, Ascension Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1100/MS-2151/MS-2155 Wash System Reactor System	NSPS Subpart RRR – SOCM I Reactor Processes [40 CFR 60.700] Waste Gas Disposal [LAC 33:III.2115] Limiting VOC Emissions from SOCM I Reactor and Distillation Operations. [LAC 33:III.2147]	DOES NOT APPLY – Constructed before June 29, 1990 (40 CFR 60.700.b) EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g) EXEMPT – Subject to HON (LAC 33:III.2147.A.2.g)
EQT1101/MR-2203 Methanation Converter Reactor System	NSPS Subpart RRR – SOCM I Reactor Processes [40 CFR 60.700]	DOES NOT APPLY – Constructed before June 29, 1990 (40 CFR 60.700.b)
	NESHAP for Source Categories Subparts F and G – Process Vent Provisions [40 CFR 63.113(e)(3), (d)]	DOES NOT APPLY – Does not contain a HON regulated organic HAP.
	Waste Gas Disposal [LAC 33:III.2115] Limiting VOC Emissions from SOCM I Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g) EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1102/MR-2201 A/B	NSPS Subpart RRR – SO2 Reactor Processes [40 CFR 60.700]	DOES NOT APPLY – Constructed before June 29, 1990 (40 CFR 60.700.b)
Aniline II Reactor System	NESHAP for Source Categories Subparts F and G - Process Vent Provisions [40 CFR 63.113(a)(2)] Waste Gas Disposal [LAC 33:III.2115] Limiting VOC Emissions from SO2 Reactor and Distillation Operations. [LAC 33:III.2147]	DOES NOT APPLY – Vents are transferred for fuel value 40 CFR 63.107(h)(6)). EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g) EXEMPT – This operation is controlled with an existing combustion device (LAC 33:III.2147.A.2.a).
EQT1103/MR-2708A/L, EQT1104/MR-2709A/L, EQT1105/GY-2754/5/6 NB II System	Waste Gas Disposal [LAC 33:III.2115] Limiting VOC Emissions from SO2 Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT – Vents are transferred for fuel value 40 CFR 63.107(h)(6)). EXEMPT – subject to HON (LAC 33:III.2147.A.2.g)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Aniline Complex
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 Rubicon LLC
 Geismar, Ascension Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1106/MR-2501A	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT – Vents are transferred for fuel value 40 CFR 63.107(h)(6).
Aniline III Reactor System	Limiting VOC Emissions from SOCFI Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT – This operation is controlled with an existing combustion device (LAC 33:III.2147.A.2.a.)
EQT1107/AS-2168	NSPS Subpart NNN – SOCFI Distillation Processes [40 CFR 60.660]	DOES NOT APPLY – Constructed before December 30, 1983 (40 CFR 60.660.b)
EQT1108/AS-2167	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g)
EQT1109/GE-2122	Limiting VOC Emissions from SOCFI Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT - subject to HON (LAC 33:III.2147.A.2.g)
EQT1110/AS-2202	NSPS Subpart NNN - SOCFI Distillation Processes [40 CFR 60.660]	DOES NOT APPLY – Constructed before December 30, 1983 (40 CFR 60.660.b).
EQT1111/MS-2248	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g)
EQT1112/AS-2204	Limiting VOC Emissions from SOCFI Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT - subject to HON (LAC 33:III.2147.A.2.g)
EQT1113/AS-2206	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT - subject to HON (LAC 33:III.2147.A.2.g)
Aniline II Distillation System	Limiting VOC Emissions from SOCFI Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT - subject to HON (LAC 33:III.2147.A.2.g)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Aniline Complex
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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1114/AS-2210	NSPS Subpart NNN – SOCFMI Distillation Processes	DOES NOT APPLY – batch operation (40 CFR 60.660(c)(3))
EQT1121/AS-2510	[40 CFR 60.660]	DOES NOT APPLY – batch operation (40 CFR 63.100(j)(4)).
Purge Distillation System	NESHAP for source Categories Subparts F and G – Process Vent Provisions [40 CFR 63.100 and 63.113(e)(3)(e)]	EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g)
EQT1115/GE-2722,	Waste Gas Disposal	EXEMPT – operated in a batch mode (LAC 33:III.2147.A.2.b)
EQT1116/AS-2768,	[LAC 33:III.2115]	EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g)
EQT1117/AS-2767,	LAC 33:III.2147 – Limiting VOC Emissions from SOCFMI Reactor and Distillation Operations.	EXEMPT – subject to HON (LAC 33:III.2147.A2.g)
EQT1118/AS-2502,	Waste Gas Disposal	EXEMPT - Meet an exemption in another section of Chapter 21. (LAC: 33.2147.A.2.g)
EQT1119/AS-2504,	[LAC 33:III.2115]	EXEMPT – subject to HON (LAC 33:III.2147.A2.g)
EQT1120/AS-2506,	LAC 33:III.2147 – Limiting VOC Emissions from SOCFMI Reactor and Distillation Operations.	EXEMPT – subject to HON (LAC 33:III.2147.A2.g)
EQT1134/AS-2736		
Distillation System and NOx Scrubber		

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT1207/MS-2159, EQT1208/MS-2725,	Storage of VOC Compounds [LAC 33:III.2103]	DOES NOT APPLY – Vapor pressure < 1.5 psia (LAC 33:III.2103 A).
EQT1209/MS-2511, EQT1210/MS-2524, EQT1211/MS-2227	NESHAP Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid [40 CFR 60.110b]	DOES NOT APPLY – Capacity < 19,813 gallons (40 CFR 60.110b(a)).
EQT1212/MS-2251, EQT1213/MS-2231, EQT1214/MS-2224, Surge Control Vessels	NESHAP for Source Categories Subparts F and H – Surge Control Vessel Provisions [40 CFR 63.100 and 63.170]	DOES NOT APPLY – Capacity < 19,813 gallons (40 CFR 63.170, Table 2).
CRG0031 (EQT1216 – EQT1263) Water Heater Exchangers	NESHAP for Source Categories – General Provisions, Subpart F [40 CFR 63.104(a)(1)]	EXEMPT – Cooling water pressure is 35 kPa (5.08 psi) above maximum process side operating pressure.
EQT1267/MR-2202 EQT1268/MR-2503	NESHAP for Source Categories – General Provisions, Subpart F [40 CFR 63.104(a)(6)]	DOES NOT APPLY – Exchangers do not contain > 5% of an organic HAP (40 CFR 63.104 Subpart F-Table 4).
Aniline II & III Workup Reactors	Waste Gas Disposal [LAC 33:III.2115] Limiting VOC Emissions from SOCOMI Reactor and Distillation Operations. [LAC 33:III.2147]	EXEMPT – Vents are transferred for fuel value 40 CFR 63.107(h)(6)). EXEMPT – This operation is controlled with an existing combustion device (LAC 33:III.2147.A.2.a.)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
FUG0029/QF Aniline-II Cooling Tower Fugitives	Subpart Q – NESHAP for Industrial Process Cooling Towers [40 CFR 63.400]	DOES NOT APPLY – Not an affected unit, no chromium or chromium based water treatment chemicals used on or after September 8, 1994 (40 CFR 63.400.a.)
FUG0030/YF Wastewater System Fugitives	Limiting Volatile Organic Compound Emissions From Industrial Wastewater [LAC 33:III.2153]	EXEMPT – Subject to HON maintenance wastewater provisions (2153.G.6).

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

PART 70 SPECIFIC CONDITIONS

Aniline Complex
Agency Interest No.: 1468
Rubicon LLC
Geismar, Ascension Parish, Louisiana

This permit is issued under the following conditions:

1. Permittee shall operate the Benzene Scrubbers/Aniline II Boiler as MACT for compliance with LAC 33:III.5109.A, maintain a TRE > 1.0 in the Benzene Scrubbers, and comply with the emission limits of this permit. The scrubbers and boiler shall operate within the operating conditions found in Part 70 Specific Conditions 2 and 4, respectively. Records of benzene feed rate, nitrobenzene scrubbing flow rate and temperature of the scrubber and operating conditions shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.
2. NB I and NB II Benzene Scrubbers venting to the Aniline II Boiler shall vent to the atmosphere, through Emission Points PA and XA, for no more than 40 days (960 hours) a year when the boiler is out of service. The NB I Benzene Scrubber will be the 95% control for the benzene tank MT-2401. The NB I Benzene Scrubber will be operated within the following parameters outlined below. Operating parameters (benzene feed rate, nitrobenzene scrubbing flow rate and temperature) are based on a daily 24-hour average when venting to the atmosphere. In the event that the Nitrobenzene flow rate exceeds 10,000 lbs/hr, the permittee must ensure that NB I Benzene Scrubber continuous to comply with the 95% control efficiency requirement.

Nitrobenzene Flow Rate vs. Nitrobenzene Temperature (°F) at Various Benzene Feed Rates
 (NB I Scrubber only):

Nitrobenzene Flow lb/hr	Nitrobenzene Temperature (°F) at Benzene Feed Rate of										
	19 gpm	39 gpm	59 gpm	79 gpm	98 gpm	118 gpm	130 gpm	138 gpm	158 gpm	178 gpm	197 gpm
4000	57.30										
4500	63.26	56.53									
5000	67.43	62.50	57.44	52.33							
5500	70.49	66.74	62.88	58.92	54.83	50.81					
6000	72.68	69.88	66.79	63.72	60.46	57.22	55.38	54.08	50.84		
6500	74.40	72.14	69.83	67.29	64.69	62.08	60.57	59.50	56.85	54.19	51.39
7000	75.69	73.90	71.98	70.00	67.91	65.81	64.55	63.68	61.51	59.29	56.95
7500	76.68	75.30	73.72	72.10	70.43	68.70	67.64	66.93	65.18	63.25	61.33
8000	77.50	76.35	75.14	73.78	72.33	70.96	70.13	69.55	67.99	66.46	64.91
8500	78.17	77.20	76.15	75.14	73.91	72.71	72.01	71.55	70.34	69.01	67.63
9000	78.70	77.88	77.02	76.12	75.22	74.21	73.57	73.16	72.12	71.08	70.00
9500	79.16	78.47	77.70	76.95	76.18	75.39	74.90	74.56	73.63	72.70	71.75
10000	79.52	78.93	78.32	77.64	76.96	76.29	75.88	75.61	74.90	74.10	73.24

PART 70 SPECIFIC CONDITIONS

Aniline Complex
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Rubicon LLC
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3. Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.
- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (HON) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
 - b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
 - c. Permittee shall comply with record keeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Aniline Complex	40 CFR 63 Subpart H-HON	≥5% VOHAP	40 CFR 63 Subpart H-HON
	40 CFR 61 Subpart J & V – NESHAP for Equipment Leaks	≥10% VOHAP	
	LAC 33:III.5109 (63 Subpart H-HON)	≥5% Class I & II	
	40 CFR 60 Subparts VV – NSPS for Equipment Leaks of VOC in SOCM I or Refineries	≥10% VOC	
	LAC 33:III.2122 – Fugitive Emission Control for Ozone Nonattainment Areas and Specified Parishes	≥10% VOC	

PART 70 SPECIFIC CONDITIONS

Aniline Complex
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4. Permittee shall operate the Aniline II (BIF) Boiler (Emission Point EQT1039/QB) in compliance with the most recent Re-certification as MACT for compliance with LAC 33:III.5109.A, maintain compliance with permitted emission limits, and demonstrate 98% destruction and removal efficiency for VOC TAPs.

- a. Based on compliance test results, permittee shall operate the Aniline II Boiler within the following parameters:

A. Minimum boiler startup combustion temperature °F	1,000 ⁽¹⁾
B. Minimum combustion chamber temperature °F	1,769, hourly rolling average ⁽²⁾
C. Maximum carbon monoxide conc., ppmv @7% O ₂ (dry)	100 ⁽³⁾
D. Maximum PM ₁₀ concentration gr/dscf @7% O ₂ (dry)	0.04
E. Maximum hazardous waste feed rate, lb/hr	1,237 ⁽⁴⁾
F. Maximum vent gas feed rate, lb/hr	8,000
G. DRE with hazardous waste feed, %	99.99
H. DRE without hazardous waste feed, %	98 ⁽⁵⁾
I. Minimum O ₂ in exhaust stack, %	2 ⁽⁶⁾
J. Minimum baghouse differential pressure	0.25 inches of water

⁽¹⁾ Minimum temperature before vent gases can be fed.

⁽²⁾ Minimum operating temperature when hazardous waste or hazardous waste and vent gas is being fed.

⁽³⁾ CO limit is based on one hour rolling average of CO concentrations, taken at one minute intervals and only applicable when burning hazardous waste.

⁽⁴⁾ Maximum hazardous waste feed limit is based on one hour rolling average of flow rates taken at one minute intervals.

⁽⁵⁾ DRE required by CAA/HON for MACT of vent stream.

⁽⁶⁾ Action shall be taken if O₂ concentration remains below 2% for over five minutes while combusting vent gases. Exceedance shall be recorded with corrective action taken.

- b. Permittee shall install and maintain baghouses as MACT for particulate emission control for the Aniline II Boiler (Emission Point QB). Particulate emissions shall be maintained below 0.04 grains/dscf. Filter vents shall be visually inspected for opacity on a daily basis. If visible emissions are detected, then, within three days, the permittee shall conduct opacity readings in accordance with EPA Reference Method 9 or 22. The Filter elements (bags) shall be inspected every six months and changes as necessary. Records of opacity checks shall include emission point ID, date visual emissions were detected, and results of the test. These records and maintenance inspections of the bag filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.

PART 70 SPECIFIC CONDITIONS**Aniline Complex
Agency Interest No.: 1468
Rubicon LLC
Geismar, Ascension Parish, Louisiana**

- c. Continuous analyzers shall be installed, maintained, and calibrated to provide a continuous record of CO and O₂ concentration in the boiler stack gas. These analyzers shall comply with provisions of 40 CFR 266, Appendix IX (i.e., Methods Manual for Compliance with the BIF Regulations).

The following operating parameters shall be continuously monitored and recorded when the unit is operating. Data shall be retained from these points either in computer memory or hard copy.

1. Combustion chamber temperature
 2. Hazardous waste liquid feed
 3. Vent gas and hydrogen flow
 4. Bag collector differential pressure
- d. Waste feed to the Aniline II Plant Boiler shall be cut off on deviation from specified range for a period exceeding five minutes for carbon monoxide concentration (average), maximum feed rates, minimum O₂, and minimum combustion chamber temperature. Records of the monitored parameters shall be maintained on site and available for review by the Office of Environmental Compliance, Surveillance Division.
- e. Permittee shall perform a compliance test at maximum operating conditions (worst case) at the request of LDEQ to confirm compliance with MACT and the emission limits of this permit.
- f. Vent gas is not to be vented to the atmosphere (except in accordance with Specific Condition No. 3) under deviation from operating conditions. Deviations are to be logged and corrective action taken.

General Information

AI ID: 1468 Rubicon LLC - Geismar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

Also Known As:

ID	Name	User Group	Start Date
0180-00006	CDS Number	CDS Number	05-27-1993
8465311	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008
LAD008213191	Rubicon LLC - Geismar Plant	Hazardous Waste Notification	07-22-1980
PMT/PC	Rubicon LLC - Geismar Plant	Hazardous Waste Permitting	10-01-1997
LAD008213191	Rubicon LLC - Geismar Plant	Inactive & Abandoned Sites	07-01-1981
LA0000892	LPDES #	LPDES Permit #	06-25-2003
LAR05N485	LPDES #	LPDES Permit #	08-08-2004
WP1493	LWDPS #	LWDPS Permit #	06-25-2003
	Rubicon LLC	Multimedia	12-24-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
LA-2232-L01	Radioactive Material License	Radiation License Number	11-23-1999
GD-005-1646	Site ID #	Solid Waste Facility No.	11-21-1999
38794	Rubicon LLC - Geismar Plant	TEMPO Merge	10-30-2000
48042	Rubicon LLC - Geismar Plant	TEMPO Merge	01-30-2001
70734RBCNN9156H	TRI #	Toxic Release Inventory	07-19-2004
1482	Rubicon LLC - Geismar Plant	UST Case Number	11-21-1999
1843	Rubicon LLC - Geismar Plant	UST Case Number	11-21-1999
03011102	UST Facility ID (from UST legacy data)	UST FID #	10-11-2002

Physical Location:

9156 Hwy 75
 Geismar, LA 70734

Main FAX: 2256732470
Main Phone: 2252425000

Mailing Address:

PO Box 517
 Geismar, LA 707340517

Location of Front Gate:

30.199672 latitude, -91.010128 longitude, Coordinate Method: Lat,Long, - DMS, Coordinate Datum: NAD83

Related People:

Name	Mailing Address	Phone (Type)	Relationship
Mark Dearman	PO Box 517 Geismar, LA 707340517		Responsible Official for
Michelle Eaglin	PO Box 517 Geismar, LA 707340517	2252425590 (WP)	Underground Storage Tank Contact for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734	2252425324 (WP)	Radiation Safety Officer for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734		Radiation Safety Officer for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734	Tom_J_Harbourn@H	Radiation Safety Officer for
Tom Harbourn	9156 Hwy 75 Geismar, LA 70734	2259783921 (CP)	Radiation Safety Officer for
Phil Kerr	PO Box 517 Geismar, LA 707340517	PHILLIP_A_KERR@	Air Permit Contact For
Phil Kerr	PO Box 517 Geismar, LA 707340517	2252425027 (WP)	Air Permit Contact For

General Information

AI ID: 1468 Rubicon LLC - Gelsmar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Phil Kerr	PO Box 517 Gelsmar, LA 707340517	PHILLIP_A_KERR@	Emission Inventory Contact for
	Phil Kerr	PO Box 517 Gelsmar, LA 707340517	2252425027 (WP)	Emission Inventory Contact for
	Scott Kurler	PO Box 517 Gelsmar, LA 707340517		Responsible Official for
	Anthony Nelson	PO Box 517 Gelsmar, LA 707340517		Water Permit Contact For
	Clyde Stevens	PO Box 517 Gelsmar, LA 707340517		Responsible Official for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	UST Billing Party for
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	Owns
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	Air Billing Party for
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	Radiation License Billing Party for
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	Emission Inventory Billing Party
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	Solid Waste Billing Party for
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	Haz. Waste Billing Party for
	Rubicon LLC	PO Box 517 Gelsmar, LA 707340517	2252425000 (WP)	Water Billing Party for
	Rubicon LLC - Gelsmar Plant	9156 Hwy 75 Gelsmar, LA 70734		Accident Prevention Billing Party for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Millam, Permit Support Services Division, at (225) 218-3259 or email your changes to facupdate@ia.gov.

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Aniline Complex						
EQT 1035	OB - Nitric Acid Vent Scrubber AS-1417		3 gallons/min	1 gallons/min		8760 hr/yr
EQT 1036	PA - NB-I Benzene Scrubber AS-2113		10000 lb/hr	5000 lb/hr		8760 hr/yr
EQT 1037	PC - NB-I Loading/Unloading		2.25 MM gallons/yr	2 MM gallons/yr		8760 hr/yr
EQT 1038	QA - Aniline-II Vent Scrubber AS-2203		20 gallons/min	15 gallons/min		8760 hr/yr
EQT 1039	QB - Aniline-II Boiler HN-2201		26.5 MM BTU/hr	25.7 MM BTU/hr		8760 hr/yr
EQT 1040	QC - Aniline-II Loading/Unloading		1.26 MM gallons/yr	.5 MM gallons/yr		8760 hr/yr
EQT 1041	QL - Aniline II Wet Purge Still Residue Loading		60000 gallons/yr	10000 gallons/yr		8760 hr/yr
EQT 1042	QM - Aniline II Dry/Reactor Purge Still Residue Loading		86000 gallons/yr	10000 gallons/yr		8760 hr/yr
EQT 1043	XA - NB II Benzene Scrubber AS-2713		10000 lb/hr	4000 lb/hr		8760 hr/yr
EQT 1044	YA - Aniline-III Vent Scrubber AS-2503		20 gallons/min	15 gallons/min		8760 hr/yr
EQT 1045	YE - Aniline-II Vent KO Drum MS-2223		12 gallons/min	2 gallons/min		8760 hr/yr
EQT 1046	MR-2108 A-F - NB I Nitrator Reactor System			10000 lb/hr		8760 hr/yr
EQT 1047	MF-1455A - Nitric Acid Storage Tank	126000 gallons				8760 hr/yr
EQT 1048	MF-1455B - Nitric Acid Storage Tank	126000 gallons				8760 hr/yr
EQT 1049	MF-1401C - Nitric Acid Storage Tank	260000 gallons				8760 hr/yr
EQT 1050	MT-2401 - Benzene Storage Tank	230000 gallons				8760 hr/yr
EQT 1051	MT-2404 - Nitrobenzene Storage Tank	260000 gallons				8760 hr/yr
EQT 1052	MF-2437 - Dry Nitrobenzene Storage Tank	50700 gallons				8760 hr/yr
EQT 1053	MT-2217A/B - Aniline Test Tanks	39600 gallons				8760 hr/yr
EQT 1054	MT-2405 - Nitrobenzene Bulk Storage Tank	507600 gallons				8760 hr/yr
EQT 1055	MT-2406 - Aniline Bulk Storage Tank	1.21 million gallons				8760 hr/yr
EQT 1056	MT-2500 - Aniline Bulk Storage Tank	1.21 million gallons				8760 hr/yr
EQT 1057	MF-2100 - Wash Water Tank					8760 hr/yr
EQT 1059	MF-2700 - NB Stripper Feed Tank	19100 gallons				8760 hr/yr
EQT 1060	MS-2209 - Crude Aniline Storage	40000 gallons				8760 hr/yr
EQT 1061	MF-2240 - Aniline Rework Tank	40000 gallons				8760 hr/yr
EQT 1062	MS - 2207 - Reactor Residue Vessel	22500 gallons				8760 hr/yr
EQT 1063	MS-2241 - Reactor Residue Recovery Vessel	22500 gallons				8760 hr/yr
EQT 1064	MS-2509 - Crude Aniline Storage	40000 gallons				8760 hr/yr
EQT 1065	MS-2555 - Aniline Water Stripper Feed					8760 hr/yr
EQT 1066	GY-2187 - Dry NB Weir Pot					8760 hr/yr
EQT 1067	MM-2101 - Centrifuge Overflow Pot					8760 hr/yr
EQT 1068	MM-2246 - Aniline Separator Hold Pot					8760 hr/yr
EQT 1069	MM-2701A/B/C - Centrifuge Overflow Pots					8760 hr/yr
EQT 1070	MS-2101 - Nitric Acid Pump Tank	3300 gallons				8760 hr/yr
EQT 1071	MS-2103 - Benzene Pump Tank	3300 gallons				8760 hr/yr
EQT 1072	MS-2105 - Crude NB Interim Tank	3000 gallons				8760 hr/yr

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Aniline Complex						
EQT 1073	MS-2108 - NB Pump Tank	3300 gallons				8760 hr/yr
EQT 1074	MS-2108 - NB Overflow Tank	1000 gallons				8760 hr/yr
EQT 1075	MS-2125 - Barometric Seal Tank	4200 gallons				8760 hr/yr
EQT 1076	MS-2169 - Centrifuged NB Tank	2000 gallons				8760 hr/yr
EQT 1077	MS-2171 - Washed NB Pump Tank	2300 gallons				8760 hr/yr
EQT 1078	MS-2172 - NB Condensate Separator	5000 gallons				8760 hr/yr
EQT 1079	MS-2205 - Aniline Let Down Drum	825 gallons				8760 hr/yr
EQT 1080	MS-2206 - Amine Water Let Down Drum	277 gallons				8760 hr/yr
EQT 1081	MS-2210AVB - Weir Boxes					8760 hr/yr
EQT 1082	MS-2213 - Semi-refined Tank	5300 gallons				8760 hr/yr
EQT 1083	MS-2219 - Amine Water Tank	13000 gallons				8760 hr/yr
EQT 1084	MS-2221 - Wet Purge Tank	14000 gallons				8760 hr/yr
EQT 1085	MS-2222 - Dry Purge Tank	8400 gallons				8760 hr/yr
EQT 1086	MS-2229 - Weak CHA Tank	6100 gallons				8760 hr/yr
EQT 1087	MS-2230 - Wet Purge Residue Tank	3200 gallons				8760 hr/yr
EQT 1088	MS-2242 - Amine Water Pump Tank	13000 gallons				8760 hr/yr
EQT 1089	MS-2246 - Benzene Recycle Tank (Alternative Operating Scenario)	15000 gallons				8760 hr/yr
EQT 1090	MM-2249 - DH O/H Separator Weir Pot					8760 hr/yr
EQT 1091	MS-2505 - Aniline Let Down Drum					8760 hr/yr
EQT 1092	MS-2508 - MS-2508 - Amine Water Let Down Drum					8760 hr/yr
EQT 1093	MS-2510A - Reactor Binary Separator Weir Box					8760 hr/yr
EQT 1094	MS-2513 - Semi-refined Tank	5300 gallons				8760 hr/yr
EQT 1095	MS-2701 - Nitric Acid Pump Tank	3300 gallons				8760 hr/yr
EQT 1096	MS-2703 - Benzene Pump Tank	3300 gallons				8760 hr/yr
EQT 1098	MS-2769 - Product Pump Tank	2000 gallons				8760 hr/yr
EQT 1099	MS-2772 - NB Condensate Separator					8760 hr/yr
EQT 1100	MS-2151 & MS-2155 - Wash System Reactor System					8760 hr/yr
EQT 1101	MR-2203 - Methanation Converter Reactor System					8760 hr/yr
EQT 1102	MR-2201 A/B - Aniline II Reactor System					8760 hr/yr
EQT 1103	MR-2708A/L - NB II Nitrator Train 1					8760 hr/yr
EQT 1104	MR-2709A/L - NB II Nitrator Train 2					8760 hr/yr
EQT 1105	GY-2754/5/6 - NB II Washer Contactors					8760 hr/yr
EQT 1106	MR-2501A - Aniline III Reactor System					8760 hr/yr
EQT 1107	AS-2168 - NB I Bz Stripping Distillation System					8760 hr/yr
EQT 1108	AS-2167 - NB II Effluent Stripping Distillation System					8760 hr/yr
EQT 1109	GE-2122 - NB I Sulfuric Acid Concentrator Distillation System					8760 hr/yr
EQT 1110	AS-2202 - Aniline II Dehydration Distillation System					8760 hr/yr

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Aniline Complex						
EQT 1111	MS-2248 - Aniline II Amine Water Extract Distillation System					8760 hr/yr
EQT 1112	AS-2204 - Aniline II Refining Column Distillation System					8760 hr/yr
EQT 1113	AS-2206 - Aniline II Amine Water Stripper Distillation System					8760 hr/yr
EQT 1114	AS-2210 - Purge Still Distillation System					8760 hr/yr
EQT 1115	GE-2722 - NB II Sulfuric Acid Flash Evaporator Distillation System					8760 hr/yr
EQT 1116	AS-2768 - NB II Benzene Stripping Distillation System					8760 hr/yr
EQT 1117	AS-2767 - NB II Effluent Stripping Distillation System					8760 hr/yr
EQT 1118	AS-2502 - Aniline III Dehydration Distillation System					8760 hr/yr
EQT 1119	AS-2504 - Aniline III Refining Column Distillation System					8760 hr/yr
EQT 1120	AS-2506 - Aniline III Amine Water Stripper Distillation System					8760 hr/yr
EQT 1121	AS-2510 - Dry Purge Still Distillation System					8760 hr/yr
EQT 1127	GS-2786AVS - VOC / Water Separators					8760 hr/yr
EQT 1128	GS-2186 - VOC / Water separator					8760 hr/yr
EQT 1129	GS-2187 - Centrifugal Separator					8760 hr/yr
EQT 1130	WW - Aniline Complex Wastewater					8760 hr/yr
EQT 1133	AS-2136 - NOx Absorption Column					8760 hr/yr
EQT 1134	AS-2736 - NOx Scrubber					8760 hr/yr
EQT 1135	TT-2166 - NB Product Exchanger					8760 hr/yr
EQT 1136	TT-2219A/B - Refined Aniline Product Coolers					8760 hr/yr
EQT 1137	TT-2519A/B - Refined Still Product Coolers					8760 hr/yr
EQT 1138	TT-2179 - Water Heat Exchanger					8760 hr/yr
EQT 1139	TT-2162 - Water Heat Exchanger					8760 hr/yr
EQT 1140	TT-2106A/B - Water Heat Exchanger					8760 hr/yr
EQT 1141	TT-2161 - Water Heat Exchanger					8760 hr/yr
EQT 1142	PE-2124A/B - Water Heat Exchanger					8760 hr/yr
EQT 1143	TT-2186 - Water Heat Exchanger					8760 hr/yr
EQT 1144	TT-2187 - Water Heat Exchanger					8760 hr/yr
EQT 1145	TT-2217A/B - Water Heat Exchanger					8760 hr/yr
EQT 1146	TT-2203A/B - Water Heat Exchanger					8760 hr/yr
EQT 1147	TT-2202 - Water Heat Exchanger					8760 hr/yr
EQT 1148	TT-2256 - Water Heat Exchanger					8760 hr/yr
EQT 1149	TT-2218 - Water Heat Exchanger					8760 hr/yr
EQT 1150	TT-2258 - Water Heat Exchanger					8760 hr/yr
EQT 1151	TT-2211 - Water Heat Exchanger					8760 hr/yr
EQT 1152	MM-2250 - Water Heat Exchanger					8760 hr/yr
EQT 1153	TT-2706 - Water Heat Exchanger					8760 hr/yr

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Aniline Complex						
EQT 1154	TT-2724A/B - Water Heat Exchanger					8760 hr/yr
EQT 1155	TT-2754 - Water Heat Exchanger					8760 hr/yr
EQT 1156	TT-2761 - Water Heat Exchanger					8760 hr/yr
EQT 1157	TT-2762 - Water Heat Exchanger					8760 hr/yr
EQT 1158	TT-2779 - Water Heat Exchanger					8760 hr/yr
EQT 1159	TT-2786A/B - Water Heat Exchanger					8760 hr/yr
EQT 1160	TT-2517A - Water Heat Exchanger					8760 hr/yr
EQT 1161	TT-2503A - Water Heat Exchanger					8760 hr/yr
EQT 1162	TT-2502 - TT-2502 - Water Heat Exchanger					8760 hr/yr
EQT 1163	TT-2556 - Water Heat Exchanger					8760 hr/yr
EQT 1164	TT-2518 - Water Heat Exchanger					8760 hr/yr
EQT 1165	TT-2558A/S - Water Heat Exchanger					8760 hr/yr
EQT 1166	TT-2508A/S - Water Heat Exchanger					8760 hr/yr
EQT 1167	TT-2511 - Water Heat Exchanger					8760 hr/yr
EQT 1168	TT-2546 - Water Heat Exchanger					8760 hr/yr
EQT 1169	TT-2247 - Water Heat Exchanger					8760 hr/yr
EQT 1170	TT-2179 - Water Heat Exchanger					8760 hr/yr
EQT 1173	PE-2724A/B - Water Heat Exchanger					8760 hr/yr
EQT 1175	TT-2259 - Water Heat Exchanger					8760 hr/yr
EQT 1176	TT-2206 - Water Heat Exchanger					8760 hr/yr
EQT 1177	TT-2502 - Water Heat Exchanger					8760 hr/yr
EQT 1178	MM-215 - Water Heat Exchanger					8760 hr/yr
EQT 1179	TT-2257 - Water Heat Exchanger					8760 hr/yr
EQT 1180	TT-2163A/B - Water Heat Exchanger					8760 hr/yr
EQT 1181	TT-2240A/B - Water Heat Exchanger					8760 hr/yr
EQT 1182	TT-2215 - Water Heat Exchanger					8760 hr/yr
EQT 1183	TT-2240A/B - Water Heat Exchanger					8760 hr/yr
EQT 1184	TT-2736 - Water Heat Exchanger					8760 hr/yr
EQT 1185	TT-2741 - Water Heat Exchanger					8760 hr/yr
EQT 1186	TT-2243 - Water Heat Exchanger					8760 hr/yr
EQT 1187	TT-2764 - Water Heat Exchanger					8760 hr/yr
EQT 1188	TT-2543 - Water Heat Exchanger					8760 hr/yr
EQT 1189	TT-2111A - Water Heat Exchanger					8760 hr/yr
EQT 1190	TT-2402 - Water Heat Exchanger					8760 hr/yr
EQT 1207	MS-2159 - Surge Vessel					8760 hr/yr
EQT 1208	MS-2725 - Surge Vessel					8760 hr/yr
EQT 1209	MS-2511 - Surge Vessel					8760 hr/yr
EQT 1210	MS-2524 - Surge Vessel					8760 hr/yr
EQT 1211	MS-2227 - Surge Vessel					8760 hr/yr

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20090003
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Alr - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Aniline Complex						
EQT 1212	MS-2251 - Surge Vessel					8760 hr/yr
EQT 1213	MS-2231 - Surge Vessel					8760 hr/yr
EQT 1214	MS-2224 - Surge Vessel					8760 hr/yr
EQT 1215	GY-2186 - Dry NB Coalescer Separator					8760 hr/yr
EQT 1216	TT-2163AVB - Water Heat Exchanger					8760 hr/yr
EQT 1217	GR-2141 - Water Heat Exchanger					8760 hr/yr
EQT 1218	TT-2215 - Water Heat Exchanger					8760 hr/yr
EQT 1219	TT-2240AVB - Water Heat Exchanger					8760 hr/yr
EQT 1240	TT-2760 - Water Heat Exchanger					8760 hr/yr
FUG 0028	QD - Aniline Complex Fugitive Emissions					8760 hr/yr
FUG 0029	QF - Aniline-II Cooling Tower Fugitives	16000 gallons/min	16000 gallons/min	16000 gallons/min		8760 hr/yr
FUG 0030	YF - Wastewater System Fugitives					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Aniline Complex							
EQT 1035	OB - Nitric Acid Vent Scrubber AS-1417	.38	6.13	.67		24	100
EQT 1036	PA - NB-I Benzene Scrubber AS-2113	24.4	126	.33		102.5	95
EQT 1037	PC - NB-I Loading/Unloading	.18	33.8	2		12	65
EQT 1038	QA - Aniline-II Vent Scrubber AS-2203	10.4	220.4	.67		75	67
EQT 1039	QB - Aniline-II Boiler HN-2201	76.89	25000	2.63		104.64	350
EQT 1040	QC - Aniline-II Loading/Unloading	.19	35.6	2		12	85
EQT 1043	XA - NB II Benzene Scrubber AS-2713	24.4	126	.33		102.5	95
EQT 1044	YA - Aniline-III Vent Scrubber AS-2503	41.48	220	.34		70	95
EQT 1045	YE - Aniline-II Vent KO Drum MS-2223	4.99	485.9	1.44		55	75

Relationships:

ID	Description	Relationship	ID	Description
EQT 1046	MR-2108 A-F - NB I Nitrator Reactor System	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1046	MR-2108 A-F - NB I Nitrator Reactor System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1047	MF-1455A - Nitric Acid Storage Tank	Vents to	EQT 1035	OB - Nitric Acid Vent Scrubber AS-1417
EQT 1048	MF-1455B - Nitric Acid Storage Tank	Vents to	EQT 1035	OB - Nitric Acid Vent Scrubber AS-1417
EQT 1049	MF-1401C - Nitric Acid Storage Tank	Vents to	EQT 1035	OB - Nitric Acid Vent Scrubber AS-1417
EQT 1050	MT-2401 - Benzene Storage Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1050	MT-2401 - Benzene Storage Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
EQT 1051	MT-2404 - Nitrobenzene Storage Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1052	MF-2437 - Dry Nitrobenzene Storage Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1052	MF-2437 - Dry Nitrobenzene Storage Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1053	MT-2217A/B - Aniline Test Tanks	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1054	MT-2405 - Nitrobenzene Bulk Storage Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1055	MT-2406 - Aniline Bulk Storage Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1056	MT-2500 - Aniline Bulk Storage Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1057	MF-2100 - Wash Water Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1057	MF-2100 - Wash Water Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1059	MF-2700 - NB Stripper Feed Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1059	MF-2700 - NB Stripper Feed Tank	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1060	MS-2209 - Crude Aniline Storage	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1061	MF-2240 - Aniline Rework Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1062	MS - 2207 - Reactor Residue Vessel	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1063	MS-2241 - Reactor Residue Recovery Vessel	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1064	MS-2509 - Crude Aniline Storage	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503
EQT 1065	MS-2555 - Amine Water Stripper Feed	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503
EQT 1066	GY-2187 - Dry NB Weir Pot	Vents to	EQT 1038	PA - NB-I Benzene Scrubber AS-2113
EQT 1066	GY-2187 - Dry NB Weir Pot	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1067	MM-2101 - Centrifuge Overflow Pot	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1067	MM-2101 - Centrifuge Overflow Pot	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1068	MM-2246 - Aniline Separator Hold Pot	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1069	MM-2701A/B/C - Centrifuge Overflow Pots	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1069	MM-2701A/B/C - Centrifuge Overflow Pots	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1070	MS-2101 - Nitric Acid Pump Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1070	MS-2101 - Nitric Acid Pump Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1071	MS-2103 - Benzene Pump Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1071	MS-2103 - Benzene Pump Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1072	MS-2105 - Crude NB Interim Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1072	MS-2105 - Crude NB Interim Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1073	MS-2106 - NB Pump Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1073	MS-2106 - NB Pump Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1074	MS-2108 - NB Overflow Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1074	MS-2108 - NB Overflow Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1075	MS-2125 - Barometric Seal Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1075	MS-2125 - Barometric Seal Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
EQT 1076	MS-2169 - Centrifuged NB Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1076	MS-2169 - Centrifuged NB Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1077	MS-2171 - Washed NB Pump Tank	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1077	MS-2171 - Washed NB Pump Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1078	MS-2172 - NB Condensate Separator	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1078	MS-2172 - NB Condensate Separator	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1079	MS-2205 - Aniline Let Down Drum	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223
EQT 1080	MS-2206 - Amine Water Let Down Drum	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223
EQT 1081	MS-2210A/B - Weir Boxes	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1081	MS-2210A/B - Weir Boxes	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223
EQT 1082	MS-2213 - Semi-refined Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1083	MS-2219 - Amine Water Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1084	MS-2221 - Wet Purge Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1085	MS-2222 - Dry Purge Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1086	MS-2229 - Weak CHA Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1087	MS-2230 - Wet Purge Residue Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1088	MS-2242 - Amine Water Pump Tank	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1089	MS-2246 - Benzene Recycle Tank (Alternative Operating Scenario)	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1090	MM-2249 - DH OH Separator Weir Pot	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223
EQT 1091	MS-2505 - Aniline Let Down Drum	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223
EQT 1092	MS-2506 - MS-2506 - Amine Water Let Down Drum	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1093	MS-2510A - Reactor Binary Separator Weir Box	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223
EQT 1093	MS-2510A - Reactor Binary Separator Weir Box	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1094	MS-2513 - Semi-refined Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1095	MS-2701 - Nitric Acid Pump Tank	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1095	MS-2701 - Nitric Acid Pump Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1096	MS-2703 - Benzene Pump Tank	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1096	MS-2703 - Benzene Pump Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1098	MS-2769 - Product Pump Tank	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1098	MS-2769 - Product Pump Tank	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1099	MS-2772 - NB Condensate Separator	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1099	MS-2772 - NB Condensate Separator	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1100	MS-2151 & MS-2155 - Wash System Reactor System	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1100	MS-2151 & MS-2155 - Wash System Reactor System	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1102	MR-2201 A/B - Aniline II Reactor System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1102	MR-2201 A/B - Aniline II Reactor System	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
EQT 1103	MR-2709AL - NB II Nitrator Train 1	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1103	MR-2709AL - NB II Nitrator Train 1	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1104	MR-2709AL - NB II Nitrator Train 2	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1104	MR-2709AL - NB II Nitrator Train 2	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1105	GY-2754/5/6 - NB II Washer Contactors	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1105	GY-2754/5/6 - NB II Washer Contactors	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1106	MR-2501A - Aniline III Reactor System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1106	MR-2501A - Aniline III Reactor System	Vents to	EQT 1045	YE - Aniline-II Vent KO Drum MS-2223
EQT 1107	AS-2168 - NB I Bz Stripping Distillation System	Vents to	EQT 1038	PA - NB-I Benzene Scrubber AS-2113
EQT 1107	AS-2168 - NB I Bz Stripping Distillation System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1108	AS-2167 - NB II Effluent Stripping Distillation System	Vents to	EQT 1038	PA - NB-I Benzene Scrubber AS-2113
EQT 1108	AS-2167 - NB II Effluent Stripping Distillation System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1109	GE-2122 - NB I Sulfuric Acid Concentrator Distillation System	Vents to	EQT 1038	PA - NB-I Benzene Scrubber AS-2113
EQT 1109	GE-2122 - NB I Sulfuric Acid Concentrator Distillation System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1110	AS-2202 - Aniline II Dehydration Distillation System	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1111	MS-2248 - Aniline II Amine Water Extract Distillation System	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1112	AS-2204 - Aniline II Refining Column Distillation System	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1113	AS-2206 - Aniline II Amine Water Stripper Distillation System	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1114	AS-2210 - Purge Still Distillation System	Vents to	EQT 1038	QA - Aniline-II Vent Scrubber AS-2203
EQT 1115	GE-2722 - NB II Sulfuric Acid Flash Evaporator Distillation System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1115	GE-2722 - NB II Sulfuric Acid Flash Evaporator Distillation System	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1116	AS-2768 - NB II Benzene Stripping Distillation System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1116	AS-2768 - NB II Benzene Stripping Distillation System	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1117	AS-2787 - NB II Effluent Stripping Distillation System	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1117	AS-2787 - NB II Effluent Stripping Distillation System	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1118	AS-2502 - Aniline III Dehydration Distillation System	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503
EQT 1119	AS-2504 - Aniline III Refining Column Distillation System	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503
EQT 1120	AS-2506 - Aniline III Amine Water Stripper Distillation System	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503
EQT 1121	AS-2510 - Dry Purge Still Distillation System	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503
EQT 1133	AS-2136 - NOx Absorption Column	Vents to	EQT 1036	PA - NB-I Benzene Scrubber AS-2113
EQT 1133	AS-2136 - NOx Absorption Column	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1134	AS-2736 - NOx Scrubber	Vents to	EQT 1039	QB - Aniline-II Boiler HN-2201
EQT 1134	AS-2736 - NOx Scrubber	Vents to	EQT 1043	XA - NB II Benzene Scrubber AS-2713
EQT 1207	MS-2159 - Surge Vessel	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503
EQT 1208	MS-2725 - Surge Vessel	Vents to	EQT 1044	YA - Aniline-III Vent Scrubber AS-2503

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

ID	Group Type	Group Description
CRG 0013	Common Requirements Group	CRG0003 - Tanks
CRG 0014	Common Requirements Group	CRG0014 - MACT
CRG 0015	Common Requirements Group	CRG0015 - HON
CRG 0016	Common Requirements Group	CRG0016 - Distillation System
CRG 0017	Common Requirements Group	CRG0017 - TRE > 4
CRG 0031	Common Requirements Group	CRG0031 - Water Heat Exchangers
CRG 0034	Common Requirements Group	CRG034 - Surge Vessels
CRG 0035	Common Requirements Group	CRG035 - TR > 4
UNF 0003	Unit or Facility Wide	UNF003 - Aniline Complex

Group Membership:

ID	Description	Member of Groups
CRG 0014	CRG0014 - MACT	CRG00000000013
CRG 0015	CRG0015 - HON	CRG00000000013
CRG 0016	CRG0016 - Distillation System	CRG00000000013
CRG 0017	CRG0017 - TRE > 4	CRG00000000013
CRG 0031	CRG0031 - Water Heat Exchangers	CRG00000000013
CRG 0034	CRG034 - Surge Vessels	CRG00000000013
CRG 0035	CRG035 - TR > 4	CRG00000000013
EQT 1035	OB - Nitric Acid Vent Scrubber AS-1417	CRG00000000013
EQT 1036	PA - NB-I Benzene Scrubber AS-2113	CRG00000000013
EQT 1037	PC - NB-I Loading/Unloading	CRG00000000013
EQT 1038	QA - Aniline-II Vent Scrubber AS-2203	CRG00000000013
EQT 1039	QB - Aniline-II Boiler HN-2201	CRG00000000013
EQT 1040	QC - Aniline-II Loading/Unloading	CRG00000000013
EQT 1041	QL - Aniline II Wet Purge Still Residue Loading	CRG00000000013
EQT 1042	QM - Aniline II Dry/Reactor Purge Still Residue Loading	CRG00000000013
EQT 1043	XA - NB II Benzene Scrubber AS-2713	CRG00000000013
EQT 1044	YA - Aniline-III Vent Scrubber AS-2503	CRG00000000013, CRG00000000017
EQT 1045	YE - Aniline-II Vent KO Drum MS-2223	CRG00000000013
EQT 1046	MR-2108 A-F - NB I Nitrotor Reactor System	CRG00000000013
EQT 1047	MF-1455A - Nitric Acid Storage Tank	CRG00000000013
EQT 1048	MF-1455B - Nitric Acid Storage Tank	CRG00000000013
EQT 1049	MF-1401C - Nitric Acid Storage Tank	CRG00000000013
EQT 1050	MT-2401 - Benzene Storage Tank	CRG00000000013
EQT 1051	MT-2404 - Nitrobenzene Storage Tank	CRG00000000013
EQT 1052	MF-2437 - Dry Nitrobenzene Storage Tank	CRG00000000013
EQT 1053	MT-2217A/B - Aniline Test Tanks	CRG00000000013
EQT 1054	MT-2405 - Nitrobenzene Bulk Storage Tank	CRG00000000013

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
EQT 1055	MT-2406 - Aniline Bulk Storage Tank	CRG0000000013
EQT 1056	MT-2500 - Aniline Bulk Storage Tank	CRG0000000013
EQT 1057	MF-2100 - Wash Water Tank	CRG0000000013
EQT 1059	MF-2700 - NB Stripper Feed Tank	CRG0000000013, CRG0000000014
EQT 1060	MS-2209 - Crude Aniline Storage	CRG0000000013, CRG0000000014
EQT 1061	MF-2240 - Aniline Rework Tank	CRG0000000013, CRG0000000014
EQT 1062	MS - 2207 - Reactor Residue Vessel	CRG0000000013, CRG0000000014
EQT 1063	MS-2241 - Reactor Residue Recovery Vessel	CRG0000000013, CRG0000000014
EQT 1064	MS-2509 - Crude Aniline Storage	CRG0000000013, CRG0000000014
EQT 1065	MS-2555 - Amine Water Stripper Feed	CRG0000000013, CRG0000000014
EQT 1066	GY-2187 - Dry NB Weir Pot	CRG0000000013
EQT 1067	MM-2101 - Centrifuge Overflow Pot	CRG0000000013, CRG0000000014
EQT 1068	MM-2246 - Aniline Separator Hold Pot	CRG0000000013, CRG0000000014
EQT 1069	MM-2701A/B/C - Centrifuge Overflow Pots	CRG0000000013, CRG0000000014
EQT 1070	MS-2101 - Nitric Acid Pump Tank	CRG0000000013, CRG0000000014
EQT 1071	MS-2103 - Benzene Pump Tank	CRG0000000013
EQT 1072	MS-2105 - Crude NB Interim Tank	CRG0000000013, CRG0000000014
EQT 1073	MS-2106 - NB Pump Tank	CRG0000000013, CRG0000000014
EQT 1074	MS-2108 - NB Overflow Tank	CRG0000000013, CRG0000000014
EQT 1075	MS-2125 - Barometric Seal Tank	CRG0000000013
EQT 1076	MS-2169 - Centrifuged NB Tank	CRG0000000013, CRG0000000014
EQT 1077	MS-2171 - Washed NB Pump Tank	CRG0000000013, CRG0000000014
EQT 1078	MS-2172 - NB Condensate Separator	CRG0000000013, CRG0000000014
EQT 1079	MS-2205 - Aniline Let Down Drum	CRG0000000013, CRG0000000014
EQT 1080	MS-2206 - Amine Water Let Down Drum	CRG0000000013, CRG0000000014
EQT 1081	MS-2210A/B - Weir Boxes	CRG0000000013
EQT 1082	MS-2213 - Semi-refined Tank	CRG0000000013
EQT 1083	MS-2219 - Amine Water Tank	CRG0000000013, CRG0000000014
EQT 1084	MS-2221 - Wet Purge Tank	CRG0000000013, CRG0000000014
EQT 1085	MS-2222 - Dry Purge Tank	CRG0000000013
EQT 1086	MS-2229 - Weak CHA Tank	CRG0000000013
EQT 1087	MS-2230 - Wet Purge Residue Tank	CRG0000000013, CRG0000000014
EQT 1088	MS-2242 - Amine Water Pump Tank	CRG0000000013, CRG0000000014
EQT 1089	MS-2246 - Benzene Recycle Tank (Alternative Operating Scenario)	CRG0000000013
EQT 1090	MM-2249 - DH O/H Separator Weir Pot	CRG0000000013, CRG0000000014
EQT 1091	MS-2505 - Aniline Let Down Drum	CRG0000000013, CRG0000000014
EQT 1092	MS- 2506 - MS- 2506 - Amine Water Let Down Drum	CRG0000000013, CRG0000000014
EQT 1093	MS-2510A - Reactor Binary Separator Weir Box	CRG0000000013
EQT 1094	MS-2513 - Semi-refined Tank	CRG0000000013
EQT 1095	MS-2701 - Nitric Acid Pump Tank	CRG0000000013, CRG0000000014
EQT 1096	MS-2703 - Benzene Pump Tank	CRG0000000013

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
EQT 1098	MS-2769 - Product Pump Tank	CRG00000000013, CRG00000000014
EQT 1099	MS-2772 - NB Condensate Separator	CRG00000000013, CRG00000000014
EQT 1100	MS-2151 & MS-2155 - Wash System Reactor System	CRG00000000013
EQT 1101	MR-2203 - Methanation Converter Reactor System	CRG00000000013
EQT 1102	MR-2201 A/B - Aniline II Reactor System	CRG00000000013, CRG00000000014
EQT 1103	MR-2708A/L - NB II Nitrotrator Train 1	CRG00000000013, CRG00000000035
EQT 1104	MR-2709A/L - NB II Nitrotrator Train 2	CRG00000000013, CRG00000000035
EQT 1105	GY-2754/5/6 - NB II Washer Contactors	CRG00000000013, CRG00000000035
EQT 1106	MR-2501A - Aniline III Reactor System	CRG00000000013
EQT 1107	AS-2168 - NB I Bz Stripping Distillation System	CRG00000000013, CRG00000000015
EQT 1108	AS-2167 - NB II Effluent Stripping Distillation System	CRG00000000013, CRG00000000015
EQT 1109	GE-2122 - NB I Sulfuric Acid Concentrator Distillation System	CRG00000000013, CRG00000000015
EQT 1110	AS-2202 - Aniline II Dehydration Distillation System	CRG00000000013, CRG00000000016
EQT 1111	MS-2248 - Aniline II Amine Water Extract Distillation System	CRG00000000013, CRG00000000016
EQT 1112	AS-2204 - Aniline II Refining Column Distillation System	CRG00000000013, CRG00000000016
EQT 1113	AS-2206 - Aniline II Amine Water Stripper Distillation System	CRG00000000013, CRG00000000016
EQT 1114	AS-2210 - Purge Still Distillation System	CRG00000000013
EQT 1115	GE-2722 - NB II Sulfuric Acid Flash Evaporator Distillation System	CRG00000000013, CRG00000000017
EQT 1116	AS-2768 - NB II Benzene Stripping Distillation System	CRG00000000013, CRG00000000017
EQT 1117	AS-2767 - NB II Effluent Stripping Distillation System	CRG00000000013, CRG00000000017
EQT 1118	AS-2502 - Aniline III Dehydration Distillation System	CRG00000000013, CRG00000000017
EQT 1119	AS-2504 - Aniline III Refining Column Distillation System	CRG00000000013, CRG00000000017
EQT 1120	AS-2506 - Aniline III Amine Water Stripper Distillation System	CRG00000000013, CRG00000000017
EQT 1121	AS-2510 - Dry Purge Still Distillation System	CRG00000000013
EQT 1127	GS-2786A/S - VOC / Water Separators	CRG00000000013
EQT 1128	GS-2186 - VOC / Water separator	CRG00000000013
EQT 1129	GS-2187 - Centrifugal Separator	CRG00000000013
EQT 1130	WW - Aniline Complex Wastewater	CRG00000000013
EQT 1133	AS-2136 - NOx Absorption Column	CRG00000000013, CRG00000000015
EQT 1134	AS-2736 - NOx Scrubber	CRG00000000013, CRG00000000017
EQT 1135	TT-2166 - NB Product Exchanger	CRG00000000013
EQT 1136	TT-2219A/B - Refined Aniline Product Coolers	CRG00000000013
EQT 1137	TT-2519A/B - Refined Still Product Coolers	CRG00000000013
EQT 1138	TT-2179 - Water Heat Exchanger	CRG00000000013, CRG00000000014
EQT 1139	TT-2162 - Water Heat Exchanger	CRG00000000013, CRG00000000014
EQT 1140	TT-2106A/B - Water Heat Exchanger	CRG00000000013, CRG00000000014
EQT 1141	TT-2161 - Water Heat Exchanger	CRG00000000013, CRG00000000014
EQT 1142	PE-2124A/B - Water Heat Exchanger	CRG00000000013, CRG00000000014
EQT 1143	TT-2186 - Water Heat Exchanger	CRG00000000013, CRG00000000014
EQT 1144	TT-2187 - Water Heat Exchanger	CRG00000000013, CRG00000000014
EQT 1145	TT-2217A/B - Water Heat Exchanger	CRG00000000013, CRG00000000014

INVENTORIES

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Group Memberships:

ID	Description	Member of Groups
EQT 1146	TT-2203AVB - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1147	TT-2202 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1148	TT-2256 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1149	TT-2218 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1150	TT-2258 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1151	TT-2211 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1152	MM-2250 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1153	TT-2706 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1154	TT-2724AVB - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1155	TT-2754 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1156	TT-2761 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1157	TT-2762 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1158	TT-2779 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1159	TT-2786AVB - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1160	TT-2517A - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1161	TT-2503A - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1162	TT-2502 - TT-2502 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1163	TT-2556 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1164	TT-2518 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1165	TT-2558AVS - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1166	TT-2506AVS - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1167	TT-2511 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1168	TT-2546 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1169	TT-2247 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1170	TT-2179 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1173	PE-2724AVB - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1175	TT-2259 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1176	TT-2206 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1177	TT-2502 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1178	MM-215 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1179	TT-2257 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1180	TT-2163AVB - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1181	TT-2240AVB - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1182	TT-2215 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1183	TT-2240AVB - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1184	TT-2736 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1185	TT-2741 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1186	TT-2243 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1187	TT-2764 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1188	TT-2543 - Water Heat Exchanger	CRG0000000013, CRG0000000014
EQT 1189	TT-2111A - Water Heat Exchanger	CRG0000000013, CRG0000000014

INVENTORIES

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER200900003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Group Membership:		ID	Description	Member of Groups
		EQT 1190	TT-2402 - Water Heat Exchanger	CRG0000000013, CRG0000000014
		EQT 1207	MS-2159 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1208	MS-2725 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1209	MS-2511 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1210	MS-2524 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1211	MS-2227 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1212	MS-2251 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1213	MS-2231 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1214	MS-2224 - Surge Vessel	CRG0000000013, CRG0000000034
		EQT 1215	GY-2186 - Dry NB Coalescer Separator	CRG0000000013, CRG0000000031
		EQT 1216	TT-2163A/B - Water Heat Exchanger	CRG0000000013, CRG0000000031
		EQT 1217	GR-2141 - Water Heat Exchanger	CRG0000000013, CRG0000000031
		EQT 1218	TT-2215 - Water Heat Exchanger	CRG0000000013, CRG0000000031
		EQT 1219	TT-2240A/B - Water Heat Exchanger	CRG0000000013, CRG0000000031
		EQT 1240	TT-2760 - Water Heat Exchanger	CRG0000000013, CRG0000000031
		EQT 1267	MR-2202 - Aniline II Workup Reactor	CRG0000000013
		EQT 1268	MR-2503 - Aniline III Workup Reactor	CRG0000000013
		FUG 0028	QD - Aniline Complex Fugitive Emissions	CRG0000000013
		FUG 0029	QF - Aniline-II Cooling Tower Fugitives	CRG0000000013
		FUG 0030	YF - Wastewater System Fugitives	CRG0000000013
		UNF 0003	UNF003 - Aniline Complex	CRG0000000013

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0610	0610 Styrene Monomer (Rated Capacity)	3220	MM lbs/yr
1533	1533 Non-Commercial Hazardous Waste Incinerators (Thermal Capacity)	24.7	MM BTU/hr

SIC Codes:

2865	Cyclic organic crudes, intermediates, dyes and pigments	UNF 003
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year									
Aniline Complex												
EQT 1035 OB				0.09	0.15	0.40						
EQT 1036 PA				2.17	2.82	1.04				7.42	9.65	3.56
EQT 1037 PC										0.03	2.22	0.11
EQT 1038 QA	0.01	0.01	0.04							0.22	0.28	0.95
EQT 1039 OB	1.33	143.98	5.84	62.85	78.56	275.28	4.90	6.13	21.48	0.13	0.16	0.57
EQT 1040 OC										0.01	2.15	0.06
EQT 1041 OL										0.07	74.49	0.32
EQT 1042 OM										0.05	55.82	0.21
EQT 1043 XA				0.87	1.14	0.42				0.31	0.41	0.15
EQT 1044 YA	0.01	0.01	0.03							0.35	0.46	1.55
EQT 1045 YE	0.01	0.02	0.02							4.15	39.83	18.18
FUG 0028 OD										1.61	2.43	7.06
FUG 0029 OF							0.25	1.07	0.31			
FUG 0030 YF										0.49	1.61	2.15

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/BAF & OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 1036 PA	Benzene	0.20	0.27	0.10
	Nitrobenzene	2.92	3.80	1.40
EQT 1037 PC	Nitrobenzene	0.03	2.22	0.11
EQT 1038 QA	Ammonia	<0.001	0.50	0.001
	Aniline	0.01	0.01	0.03
	Benzene	0.04	0.06	0.19
	Nitrobenzene	0.01	0.01	0.03
	Phenol	<0.01	<0.01	0.01
EQT 1039 QB	Aniline	0.07	0.08	0.32
	Antimony (and compounds)	<0.01	<0.01	0.01
	Arsenic (and compounds)	<0.001	<0.001	0.002
	Barium (and compounds)	<0.01	<0.01	0.01
	Benzene	0.02	0.03	0.10
	Beryllium (Table 51.1)	<0.001	<0.001	0.002
	Cadmium (and compounds)	<0.001	<0.001	0.002
	Chlorinated Dibenzo-P-Dioxins	<0.001	<0.001	<0.001
	Chlorinated dibenzofurans	<0.001	<0.001	<0.001
	Chlorine	0.01	0.01	0.03
	Chromium VI (and compounds)	<0.001	<0.001	0.002
	Hydrochloric acid	0.01	0.01	0.02
	Lead compounds	0.001	0.001	0.004
	Mercury (and compounds)	<0.001	<0.001	0.001
	Nickel (and compounds)	0.41	2.87	1.80
	Nitrobenzene	<0.01	0.01	0.02
	Phenol	<0.01	<0.01	<0.01
	Silver	0.001	0.001	0.002
	Thallium	<0.001	<0.001	0.004
	ortho-Toluidine	<0.01	<0.01	0.02
EQT 1040 QC	Aniline	0.01	2.15	0.06
EQT 1041 QL	Aniline	<0.001	0.03	<0.001
	Benzene	0.07	74.35	0.32
EQT 1042 QM	Aniline	0.04	44.27	0.17
	Nitrobenzene	<0.01	2.31	0.01

EMISSION RATES FOR TAP/RAF & OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 1042 QM	Phenol	<0.01	4.23	0.02
	ortho-Toluidine	<0.01	4.94	0.02
EQT 1043 XA	Benzene	0.01	0.02	0.01
	Nitrobenzene	0.30	0.38	0.14
EQT 1044 YA	Ammonia	<0.001	0.50	<0.001
	Aniline	0.01	0.01	0.02
	Benzene	0.33	0.43	1.45
	Nitrobenzene	0.01	0.01	0.02
	Phenol	0.01	0.01	0.02
EQT 1045 YE	Ammonia	0.45	4.85	1.95
	Aniline	1.31	13.52	5.72
	Benzene	2.77	25.70	12.13
	Nitrobenzene	0.04	0.28	0.16
	Phenol	0.02	0.18	0.08
FUG 0028 QD	Ammonia	0.01	0.02	0.06
	Aniline	0.75	1.12	3.26
	Benzene	0.25	0.37	1.07
	Nitrobenzene	0.47	0.70	2.04
	Phenol	<0.01	<0.01	0.01
	ortho-Toluidine	0.01	0.01	0.02
FUG 0029 QF	Chlorine	<0.001	<0.001	<0.001
FUG 0030 YF	Ammonia	0.09	0.09	0.40
	Aniline	0.06	0.92	0.28
	Benzene	0.07	0.07	0.30
	Nitrobenzene	0.36	0.63	1.56
UNF 0003 UNF003	Ammonia			2.41
	Aniline			9.69
	Antimony (and compounds)			0.01
	Arsenic (and compounds)			0.002
	Barium (and compounds)			0.01
	Benzene			15.67
	Beryllium (Table 51.1)			0.002
	Cadmium (and compounds)			0.002

EMISSION RATES FOR TAP/HAP AND OTHER POLLUTANTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0003 UNF003	Chlorinated Dibenzo-P-Dioxins			<0.001
	Chlorinated dibenzofurans			0.001
	Chlorine			0.03
	Chromium VI (and compounds)			0.002
	Hydrochloric acid			0.02
	Lead compounds			0.004
	Mercury (and compounds)			0.001
	Nickel (and compounds)			1.80
	Nitrobenzene			5.49
	Phenol			0.14
	Silver			0.002
	Thallium			0.004
	ortho-Toluidine			0.06

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER200900003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

CRG 0013 CRG0003 - Tanks

Group Members: CRG 0014 0015 0016 0017 0031 0034 0035
 EQT 1046EQT 1047EQT 1048EQT 1049EQT 1050EQT 1051EQT 1052EQT 1053EQT 1054EQT 1055EQT 1056EQT 1057EQT 1059EQT 1060EQT 1061EQT 1062EQT 1063EQT 1064EQT 1065EQT 1066EQT 1067EQT 1068EQT 1069EQT 1070EQT 1071EQT 1072EQT 1073EQT 1074EQT 1075EQT 1076EQT 1077EQT 1078EQT 1079EQT 1080EQT 1081EQT 1082EQT 1083EQT 1084EQT 1085EQT 1086EQT 1087EQT 1088EQT 1089EQT 1090EQT 1091EQT 1092EQT 1093EQT 1094EQT 1095EQT 1096EQT 1098EQT 1099EQT 1100EQT 1101EQT 1102EQT 1103EQT 1104EQT 1105EQT 1106EQT 1107EQT 1108EQT 1109EQT 1110EQT 1111EQT 1112EQT 1113EQT 1114EQT 1115EQT 1116EQT 1117EQT 1118EQT 1119EQT 1120EQT 1121EQT 1122EQT 1123EQT 1124EQT 1125EQT 1126EQT 1127EQT 1128EQT 1129EQT 1130EQT 1131EQT 1132EQT 1133EQT 1134EQT 1135EQT 1136EQT 1137EQT 1138EQT 1139EQT 1140EQT 1141EQT 1142EQT 1143EQT 1144EQT 1145EQT 1146EQT 1147EQT 1148EQT 1149EQT 1150EQT 1151EQT 1152EQT 1153EQT 1154EQT 1155EQT 1156EQT 1157EQT 1158EQT 1159EQT 1160EQT 1161EQT 1162EQT 1163EQT 1164EQT 1165EQT 1166EQT 1167EQT 1168EQT 1169EQT 1170EQT 1171EQT 1172EQT 1173EQT 1174EQT 1175EQT 1176EQT 1177EQT 1178EQT 1179EQT 1180EQT 1181EQT 1182EQT 1183EQT 1184EQT 1185EQT 1186EQT 1187EQT 1188EQT 1189EQT 1190EQT 1207EQT 1208EQT 1209EQT 1210EQT 1211EQT 1212EQT 1213EQT 1214EQT 1215EQT 1216EQT 1217EQT 1218EQT 1219EQT 1240EQT 1267EQT 1268FUG 0028FUG 0029FUG 0030 UNF 0003

- 1 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 2 [LAC 33:III.2103.A] Equip with a submerged fill pipe or.
- 3 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. No additional controls required (40 CFR 63.170, Table 2).

CRG 0014 CRG0014 - MACT

Group Members: EQT 1183EQT 1184EQT 1185EQT 1186EQT 1187EQT 1188EQT 1189EQT 1190EQT 1092EQT 1093EQT 1094EQT 1095EQT 1096EQT 1097EQT 1098EQT 1099EQT 1102EQT 1103EQT 1104EQT 1105EQT 1106EQT 1107EQT 1108EQT 1109EQT 1110EQT 1111EQT 1112EQT 1113EQT 1114EQT 1115EQT 1116EQT 1117EQT 1118EQT 1119EQT 1120EQT 1121EQT 1122EQT 1123EQT 1124EQT 1125EQT 1126EQT 1127EQT 1128EQT 1129EQT 1130EQT 1131EQT 1132EQT 1133EQT 1134EQT 1135EQT 1136EQT 1137EQT 1138EQT 1139EQT 1140EQT 1141EQT 1142EQT 1143EQT 1144EQT 1145EQT 1146EQT 1147EQT 1148EQT 1149EQT 1150EQT 1151EQT 1152EQT 1153EQT 1154EQT 1155EQT 1156EQT 1157EQT 1158EQT 1159EQT 1160EQT 1161EQT 1162EQT 1163EQT 1164EQT 1165EQT 1166EQT 1167EQT 1168EQT 1169EQT 1170EQT 1171EQT 1172EQT 1173EQT 1174EQT 1175EQT 1176EQT 1177EQT 1178EQT 1179EQT 1180EQT 1181EQT 1182EQT 1059EQT 1060EQT 1061EQT 1062EQT 1063EQT 1065EQT 1066EQT 1067EQT 1068EQT 1069EQT 1070EQT 1071EQT 1072EQT 1073EQT 1074EQT 1076EQT 1077EQT 1078EQT 1079EQT 1080EQT 1083EQT 1084EQT 1088EQT 1090

- 4 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. No additional controls required.

CRG 0015 CRG0015 - HON

Group Members: EQT 1107EQT 1108EQT 1109EQT 1113

- 5 [40 CFR 63.113(a)(3)] Group 2 process vent with a TRE between 1.0 and 4.0. Comply with the requirement per 40 CFR 63.113(a)(3) and (d). [40 CFR 63.113(a)(3)]
- 6 [40 CFR 63.115(d)(1)] Determine the TRE index value by conducting a TRE determination and calculating the TRE index value according to the procedures per 40 CFR 63.115(d)(1) or (d)(2) and the TRE equation per 40 CFR 63.115(d)(3). [40 CFR 63.115(d)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

CRG 0015 CRG0015 - HON

- 7 [40 CFR 63.117(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
- 8 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
- 9 [40 CFR 63.118(j)] Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent with an organic HAP concentration less than 50 ppmv to become a Group 2 process vent with an organic HAP concentration of 50 ppmv or greater and a TRE index value less than or equal to 4.0. Include the information specified in 40 CFR 63.118(j)(1) through (j)(3). Subpart G. [40 CFR 63.118(j)]
- 10 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

CRG 0016 CRG0016 - Distillation System

Group Members: EQT 1110EQT 1111EQT 1112EQT 1113

- 11 [40 CFR 63.113(a)(3)] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.113(a)(3),(c). [40 CFR 63.113(a)(3)]
- 12 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
- 13 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

CRG 0017 CRG0017 - TRE > 4

Group Members: EQT 1043EQT 1115EQT 1117EQT 1118EQT 1119EQT 1120EQT 1134

- 14 [40 CFR 60.660] Compliance with 40 CFR 60.660 - Subpart NNN - Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations is met by complying with the HON for all organic compounds 40 CFR 63.110(d)(10).
- 15 [40 CFR 63.100] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.100.
- 16 [40 CFR 63.110(d)(10)] Shall comply with all applicable provisions of 40 CFR 63 Subpart G in lieu of NSPS applicability. [40 CFR 63.110(d)(10)]
- 17 [40 CFR 63.113(a)(3)] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.113(a)(3),(c). [40 CFR 63.113(a)(3)]
- 18 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
- 19 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

CRG 0031 CRG0031 - Water Heat Exchangers

Group Members: EQT 1216EQT 1217EQT 1218EQT 1219EQT 1240

- 20 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. No further control is required due to exchangers do not contain > 5% of organic HAP.

CRG 0034 CRG034 - Surge Vessels

Group Members: EQT 1207EQT 1208EQT 1210EQT 1211EQT 1212EQT 1213EQT 1214

- 21 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.

CRG 0035 CRG035 - TR > 4

Group Members: EQT 1103EQT 1104EQT 1105

- 22 [40 CFR 60.700] Compliance with 40 CFR 60.700 - Subpart RRR - Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes is met by complying with the HON for all organic compounds 40 CFR 63.110(d)(10).
- 23 [40 CFR 63.100] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.100.
- 24 [40 CFR 63.110(d)(10)] Shall comply with all applicable provisions of 40 CFR 63 Subpart G in lieu of NSPS applicability. [40 CFR 63.110(d)(10)]
- 25 [40 CFR 63.113(a)(3)] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.113(a)(3),(e). [40 CFR 63.113(a)(3)]
- 26 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(c). Subpart G. [40 CFR 63.118(c)]
- 27 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1035 OB - Nitric Acid Vent Scrubber AS-1417

- 28 [LAC 33:III.5107.A.2] Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 1036 PA - NB-1 Benzene Scrubber AS-2113

- 29 [40 CFR 63.113(a)(3)] Group 2 process vent with a TRE between 1.0 and 4.0. Comply with the requirement per 40 CFR 63.113(a)(3) and (d). [40 CFR 63.113(a)(3)]
- 30 [40 CFR 63.113(d)] TRE index value > 1.0 (no units). Subpart G. [40 CFR 63.113(d)]
- 31 [40 CFR 63.114(a)] Which Months: All Year Statistical Basis: None specified
Monitor benzene feed, NB flow and temperature continuously when boiler not available. Maintain TRE > 1.0 (Group 2 vent). [40 CFR 63.114(a)]

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

EQT 1036 PA - NB-I Benzene Scrubber AS-2113

- 32 [40 CFR 63.115(d)(1)] Determine the TRE index value by conducting a TRE determination and calculating the TRE index value according to the procedures per 40 CFR 63.115(d)(1) or (d)(2) and the TRE equation per 40 CFR 63.115(d)(3). [40 CFR 63.115(d)(1)]
- 33 [40 CFR 63.117(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
- 34 [40 CFR 63.118(b)] Maintain continuous records of monitored parameters, records of monitoring system breakdowns, calibration checks, etc. showing number of hours that vent goes to atmosphere. [40 CFR 63.118(b)]
- 35 [40 CFR 63.118(j)] Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent with an organic HAP concentration less than 50 ppmv to become a Group 2 process vent with an organic HAP concentration of 50 ppmv or greater and a TRE index value less than or equal to 4.0. Include the information specified in 40 CFR 63.118(j)(1) through (j)(3). Subpart G. [40 CFR 63.118(j)]
- 36 [40 CFR 63.7(a)(2)] Other testing parameters relative to the NB I Scrubber include NH₃, VOC/HAP and CO/H₂. Relative test methods include Methods 2, 2A, 2C or 2D, Method 4, Modified Method 5 or 18 and Method 18 ASTM D1946-77. [40 CFR 63.7(a)(2)]
- 37 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1037 PC - NB-I Loading/Unloading

- 38 [40 CFR 63.126(c)] Record, update annually, and maintain: (1) An analysis demonstrating the design and actual throughput. (2) Weight % organic HAP in the liquid loaded. (3) Documentation of Organic HAPs loaded. (40 CFR 63.130(f)). [40 CFR 63.126(c)]
- 39 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1038 QA - Aniline-II Vent Scrubber AS-2203

- 40 [40 CFR 63.113(a)(3)] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.113(a)(3),(e). [40 CFR 63.113(a)(3)]
- 41 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
- 42 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1039 QB - Aniline-II Boiler HN-2201

- 43 [40 CFR 63.1207] Comply with comprehensive and confirmatory testing requirements for applicable constituents - Hazardous Waste Combustors MACT.
- 44 [40 CFR 63.1209] Comply with continuous monitoring requirements for applicable constituents - Hazardous Waste Combustors MACT.
- 45 [40 CFR 63.1211] Comply with recordkeeping and reporting requirements - Hazardous Waste Combustors MACT.

SPECIFIC REQUIREMENTS

AJ ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

EQT 1039 QB - Aniline-II Boiler HN-2201

- 46 [40 CFR 63.] Comply with emission limitations and the DRE standard as required per 40 CFR 63.1203. Develop required plans, including the Operation and Maintenance Plan, Continuous Monitoring Systems and Performance Evaluation Plan, and Feedstream Analysis Plan - Hazardous Waste Combustors MACT.
- 47 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
- 48 [LAC 33:III.1311.C] Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
- 49 [LAC 33:III.1321.A] Which Months: All Year Statistical Basis: Six-minute average
 Particulate matter lead emissions shall be within the limits outlined in Table 3 of LAC 33:III.1321.A.
- 50 [LAC 33:III.5109] Boiler is certified under the Boiler and Industrial Furnace (BIF) regulations, 40 CFR Part 266. Boiler DRE for VOTAP (99.99%) and compliance with a PM10 standard of 0.04 grains/dry SCF are considered MACT.

EQT 1040 QC - Aniline-II Loading/Unloading

- 51 [40 CFR 63.126(c)] Record, update annually, and maintain: (1) An analysis demonstrating the design and actual throughput. (2) Weight % organic HAP in the liquid loaded. (3) Documentation of Organic HAPs loaded. (40 CFR 63.130(f)). [40 CFR 63.126(c)]
- 52 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1041 QL - Aniline II Wet Purge Still Residue Loading

- 53 [40 CFR 63.126(c)] Record, update annually, and maintain: (1) An analysis demonstrating the design and actual throughput. (2) Weight % organic HAP in the liquid loaded. (3) Documentation of Organic HAPs loaded. (40 CFR 63.130(f)). [40 CFR 63.126(c)]
- 54 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1042 QM - Aniline II Dry/Reactor Purge Still Residue Loading

- 55 [40 CFR 63.126(c)] Record, update annually, and maintain: (1) An analysis demonstrating the design and actual throughput. (2) Weight % organic HAP in the liquid loaded. (3) Documentation of Organic HAPs loaded. (40 CFR 63.130(f)). [40 CFR 63.126(c)]
- 56 [40 CFR 60.660] **EQT 1044 YA - Aniline-III Vent Scrubber AS-2503**
 Compliance with 40 CFR 60.660 - Subpart NNN - Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations is met by complying with the HON for all organic compounds 40 CFR 63.110(d)(10).

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelislar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

EQT 1044 YA - Aniline-III Vent Scrubber AS-2503

- 57 [40 CFR 63.100] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.100.
 58 [40 CFR 63.113(a)(3)] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.113(a)(3), (e). [40 CFR 63.113(a)(3)]
 59 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]

EQT 1045 YE - Aniline-II Vent KO Drum MS-2223

- 60 [LAC 33:III.5109.A.1] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. No additional controls required (40 CFR 63.170, Table 2).

EQT 1046 MR-2108 A-F - NB I Nitrotator Reactor System

- 61 [40 CFR 63.110(d)(10)] Comply with 40 CFR Part 60, Subpart RRR via the HON. Compliance shall be met by complying with the HON for all total organic compounds (TOC) minus methane and ethane. [40 CFR 63.110(d)(10)]
 62 [40 CFR 63.113(a)(3)] Group 2 process vent with a TRE between 1.0 and 4.0. Comply with the requirement per 40 CFR 63.113(a)(3) and (d). [40 CFR 63.113(a)(3)]
 63 [40 CFR 63.115(d)(1)] Determine the TRE index value by conducting a TRE determination and calculating the TRE index value according to the procedures per 40 CFR 63.115(d)(1) or (d)(2) and the TRE equation per 40 CFR 63.115(d)(3). [40 CFR 63.115(d)(1)]
 64 [40 CFR 63.117(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
 65 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]
 66 [40 CFR 63.118(j)] Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(e), is made that causes a Group 2 process vent with an organic HAP concentration less than 50 ppmv to become a Group 2 process vent with an organic HAP concentration of 50 ppmv or greater and a TRE index value less than or equal to 4.0. Include the information specified in 40 CFR 63.118(j)(1) through (j)(3). Subpart G. [40 CFR 63.118(j)]
 67 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1047 MF-1455A - Nitric Acid Storage Tank

- 68 [LAC 33:III.5107.A.2] Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5122, Table S1.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 1048 MF-1455B - Nitric Acid Storage Tank

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

EQT 1048 MF-1455B - Nitric Acid Storage Tank

69 [LAC 33:III.5107.A.2] **EQT 1048 MF-1455B - Nitric Acid Storage Tank** Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5122, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 1049 MF-1401C - Nitric Acid Storage Tank

70 [LAC 33:III.5107.A.2] **EQT 1049 MF-1401C - Nitric Acid Storage Tank** Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5122, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 1050 MT-2401 - Benzene Storage Tank

71 [40 CFR 60.112(a)(1)] **EQT 1050 MT-2401 - Benzene Storage Tank** Equip with a floating roof, a vapor recovery system, or their equivalents. Subpart K. [40 CFR 60.112(a)(1)]

72 [40 CFR 60.113] Petroleum liquid storage data recordkeeping by electronic or hard copy at the approved frequency. Maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period, except as provided in 40 CFR 60.113(d). Subpart K.

73 [40 CFR 61.270] Subject to NESHAP Y and the SOCMIHON. Per 40 CFR 63.110 (b)(2).

74 [40 CFR 63.119] Group 1 storage vessel with vapor pressure < 11.1 psia shall operate and maintain a fixed roof, floating roof, or closed vent system and control device (40 CFR 63.119(a)(1)).

75 [40 CFR 63.119] Group 1 storage vessel vented to control device, NB I Scrubber (PA), then to Aniline II Boiler (QB). Keep storage vessels dimensions and analysis showing capacity. Retain records for life of source. Monitor boiler combustion temperature. Monitor benzene feed, NB flow and temperature continuously on NB I Scrubber (PA) when boiler not available. Report when allowable daily average values are exceeded. Maintain continuous records of monitoring system breakdowns, calibration checks, etc. Periodic reports due semi-annually. Planned maintenance reported in periodic reports. (40 CFR 63.122(a)(4), 123(a),(f)).

76 [LAC 33:III.2103.E.2] VOC, Total >= 90 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.

77 [LAC 33:III.5109.A] Which Months: All Year. Statistical Basis: None specified
 Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1051 MT-2404 - Nitrobenzene Storage Tank

78 [40 CFR 63.119(a)(3)] **EQT 1051 MT-2404 - Nitrobenzene Storage Tank** Keep dimensions of storage vessels and analysis showing capacity. Retain records for life of source (40 CFR 63.123(a)). [40 CFR 63.119(a)(3)]

79 [40 CFR 63.119] Comply with 40 CFR 63.100 and 119(a)(3).

80 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1052 MF-2437 - Dry Nitrobenzene Storage Tank

SPECIFIC REQUIREMENTS

AJ ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

EQT 1052 MF-2437 - Dry Nitrobenzene Storage Tank

- 81 [40 CFR 60.110b] Subject to NSPS kb and SOCM I HON. Tank is a HON Group 2 storage vessel and only required to comply with HON (40 CFR 63.110 (b)(1)).
- 82 [40 CFR 63.119(a)(3)] Keep dimensions of storage vessels and analysis showing capacity. Retain records for life of source (40 CFR 63.123(a)). [40 CFR 63.119(a)(3)]
- 83 [40 CFR 63.119] Comply with 40 CFR 63.100 and 119(a)(3).
- 84 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1053 MT-2217A/B - Aniline Test Tanks

- 85 [40 CFR 63.119(a)(3)] Keep dimensions of storage vessels and analysis showing capacity. Retain records for life of source (40 CFR 63.123(a)). [40 CFR 63.119(a)(3)]
- 86 [40 CFR 63.119] Comply with 40 CFR 63.100 and 119(a)(3).
- 87 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1054 MT-2405 - Nitrobenzene Bulk Storage Tank

- 88 [40 CFR 63.119] Comply with 40 CFR 63.100 and 119(a)(3).

EQT 1055 MT-2406 - Aniline Bulk Storage Tank

- 89 [40 CFR 60.110(b)] Tank is subject to NSPS Kb and SOCM I HON. Tank is HON Group 2 storage vessel and only required to comply with 40 CFR 63.110(b)(1). [40 CFR 60.110(b)]
- 90 [40 CFR 63.119] Comply with 40 CFR 63.100 and 119(a)(3).

EQT 1056 MT-2500 - Aniline Bulk Storage Tank

- 91 [40 CFR 60.110(b)] Tank is subject to NSPS Kb and SOCM I HON. Tank is HON Group 2 storage vessel and only required to comply with 40 CFR 63.110(b)(1). [40 CFR 60.110(b)]
- 92 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1062 MS - 2207 - Reactor Residue Vessel

- 93 [LAC 33:III.2103.A] Equip with a submerged fill pipe or.
- 94 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

EQT 1064 MS-2509 - Crude Aniline Storage

95 [LAC 33:III.2103.A]

Equip with a submerged fill pipe or.

96 [LAC 33:III.2103.A]

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

EQT 1089 MS-2246 - Benzene Recycle Tank (Alternative Operating Scenario)

97 [LAC 33:III.2103.A]

Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

98 [LAC 33:III.2103.A]

Equip with a submerged fill pipe or.

99 [LAC 33:III.5109.A.1]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Shall comply with LAC 33:III.2103 - Determine as MACT.

EQT 1100 MS-2151 & MS-2155 - Wash System Reactor System

100 [40 CFR 63.113(a)(3)]

Group 2 process vent with a TRE between 1.0 and 4.0. Comply with the requirement per 40 CFR 63.113(a)(3) and (d). [40 CFR 63.113(a)(3)]

101 [40 CFR 63.114(a)]

Monitor benzene feed, NB flow and temperature continuously when boiler not available. Maintain TRE > 1.0 (Group 2 vent). [40 CFR 63.114(a)]

102 [40 CFR 63.117(a)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]

103 [40 CFR 63.118(b)].

Maintain continuous records of monitored parameters, records of monitoring system breakdowns, calibration checks, etc. showing number of hours that vent goes to atmosphere. [40 CFR 63.118(b)]

104 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1106 MR-2501A - Aniline III Reactor System

105 [40 CFR 60.700]

This reactor system complies with Subpart RRR via the HON. Compliance is met by complying with the HON for all organic compounds (63.110(d)(10)).

106 [40 CFR 63.113(a)(2)]

This reactor system is a Group 1 process vent with a TRE < 1.0. Compliance is met for all organic compounds (40 CFR 63.110(d) & 113(a)(2)). [40 CFR 63.113(a)(2)]

107 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1114 AS-2210 - Purge Still Distillation System

SPECIFIC REQUIREMENTS

AJ ID: 1468 - Rubicon LLC - Gelsmar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

EQT 1114 AS-2210 - Purge Still Distillation System

108 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of LAC 33:III.2149.A.2.b - Determined as MACT.

EQT 1120 AS-2506 - Aniline III Amine Water Stripper Distillation System

109 [40 CFR 60.660] Included as part of Aniline III Vent Scrubber Distillation System, subject to NNN, with no other releases to air (60.660(b)(3)). Compliance with NNN is met by complying with the HON for all organic compounds (63.110(d)(10)).

110 [40 CFR 63.113(a)(3)] Group 2 process vent stream with a TRE > 4.0. Comply with 40 CFR 63.113(a)(3)(c). [40 CFR 63.113(a)(3)]

111 [40 CFR 63.118(c)] Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]

112 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1121 AS-2510 - Dry Purge Still Distillation System

113 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of LAC 33:III.2149.A.2.b - Determined as MACT.

EQT 1127 GS-2786A/S - VOC / Water Separators

114 [LAC 33:III.2109.D.2] Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the information specified in LAC 33:III.2109.D.2.

115 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1128 GS-2186 - VOC / Water separator

116 [LAC 33:III.2109.D.2] Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the information specified in LAC 33:III.2109.D.2.

117 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1129 GS-2187 - Centrifugal Separator

118 [LAC 33:III.2109.D.2] Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the information specified in LAC 33:III.2109.D.2.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant

Activity Number: PER20090003

Permit Number: 2261-V4

Air - Title V Regular Permit Renewal

EQT 1129 GS-2187 - Centrifugal Separator

119 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1130 WW - Aniline Complex Wastewater

120 [40 CFR 61.355]

Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.

121 [40 CFR 61.356]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.

122 [40 CFR 63.105]

Prepare a description of maintenance procedures for wastewater(40 CFR63.105(b)). Implement the maintenance waste water plan as part of the start-up, shutdown and malfunction plan (40 CFR 63.6(e)(3). Evaluate the plan following each maintenance procedure. Modify and update plan as required (40 CFR 63.105(c)).

123 [40 CFR 63.132(a)(3)]

Documentation of stream group determination (63.147(f)). [40 CFR 63.132(a)(3)]

124 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1135 TT-2166 - NB Product Exchanger

125 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63.104 - Determined as MACT.

EQT 1136 TT-2219A/B - Refined Aniline Product Coolers

126 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63.104 - Determined as MACT.

EQT 1137 TT-2519A/B - Refined Still Product Coolers

127 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63.104 - Determined as MACT.

EQT 1215 GY-2186 - Dry NB Coalescer Separator

128 [LAC 33:III.2109.D.2]

Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the information specified in LAC 33:III.2109.D.2.

129 [LAC 33:III.5109.A]

Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

EQT 1267 MR-2202 - Aniline II Workup Reactor

- 130 [40 CFR 60.700] This reactor system complies with Subpart RRR via the HON. Compliance is met by complying with the HON for all organic compounds (63.110(d)(10)).
- 131 [40 CFR 63.113(a)(2)] This reactor system is a Group 1 process vent with a TRE < 1.0. Compliance is met for all organic compounds (40 CFR 63.110(d) & 113(a)(2)). [40 CFR 63.113(a)(2)]
- 132 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

EQT 1268 MR-2503 - Aniline III Workup Reactor

- 133 [40 CFR 60.700] This reactor system complies with Subpart RRR via the HON. Compliance is met by complying with the HON for all organic compounds (63.110(d)(10)).
- 134 [40 CFR 63.113(a)(2)] This reactor system is a Group 1 process vent with a TRE < 1.0. Compliance is met for all organic compounds (40 CFR 63.110(d) & 113(a)(2)). [40 CFR 63.113(a)(2)]
- 135 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

FUG 0028 QD - Aniline Complex Fugitive Emissions

- 136 [40 CFR 63.F] Comply with 40 CFR 63 Subparts F and H in accordance with the streaming provisions in Part 70 Specific Condition.

FUG 0029 QF - Aniline-II Cooling Tower Fugitives

- 137 [40 CFR 63.402] Maintain copies of initial notification of compliance status. Retain records for a period of 5 years.
- 138 [LAC 33:III.5107.A.2] Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

FUG 0030 YF - Wastewater System Fugitives

- 139 [40 CFR 63.100] Maintenance wastewater streams will comply with 40 CFR 63.105.
- 140 [40 CFR 63.105] Shall comply with the requirements of paragraphs 63.105 (b) through (e) for maintenance wastewaters containing those organic HAP's listed in table 9 of subpart G of this part.
- 141 [LAC 33:III.5109.A] Shall control TAP emissions to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by LDEQ. Shall comply with all applicable requirements of 40 CFR 63 Subparts F and G - Determined as MACT.

UNF 0003 UNF003 - Aniline Complex

- 142 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Geismar Plant
 Activity Number: PER20090003
 Permit Number: 2261-V4
 Air - Title V Regular Permit Renewal

UNF 0003 UNF003 - Aniline Complex

- 143 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 144 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table xx of 40 CFR 63 Subpart xx.
- 145 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 146 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 147 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 148 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 149 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 150 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 151 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 152 [LAC 33:III.501.C.1] Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III.Chapter 5. Submit a timely and complete permit application to the Office of Environmental Services as required in accordance with the procedures in LAC 33:III.Chapter 5.
- 153 [LAC 33:III.501.C.2] No construction, modification, or operation of a facility which ultimately may result in an initiation or increase in emission of air contaminants as defined in LAC 33:III.11 shall commence until the permit application has been approved, an appropriate permit fee paid (in accordance with LAC 33:III.Chapter 2), and a permit (certificate of approval) has been issued by the permitting authority.
- 154 [LAC 33:III.501.C.4] Operate the source in accordance with all terms and conditions of this permit.
- 155 [LAC 33:III.501.C.6] Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HRVOC), which include 1,3-Butadiene, Butene, cis-2-Butene, trans-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only).
- 156 [LAC 33:III.501.C.6] Comply with terms and conditions incorporated in the permit to ensure compliance with all state and federally applicable air quality requirements and standards at the source, and such other permit terms and conditions as determined by the permitting authority to be reasonable and necessary.
- 157 [LAC 33:III.501.C.6] Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.2113.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only).

SPECIFIC REQUIREMENTS

AJ ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER20090003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

UNF 0003 UNF003 - Aniline Complex

- 158 [LAC 33:III.507.E.4] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 159 [LAC 33:III.507.G.5] Alternate Operating Scenario: Operating plan recordkeeping by logbook upon each occurrence of making a change from one operating scenario to another. Record the operating scenario under which the facility is currently operating. Include in this record the identity of the sources involved, the permit number under which the scenario is included, and the date of change. Keep a copy of the log on site for at least two years. Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109.B. Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 162 [LAC 33:III.5105.A.4]
- 163 [LAC 33:III.5107.A.2]
- 164 [LAC 33:III.5107.A] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III. Chapter 51. Subchapter A. Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. Submit Annual Emissions Report (TED): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 165 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 166 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923. Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 167 [LAC 33:III.5107.B.4]
- 168 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 169 [LAC 33:III.517.A.1] Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III. Chapter 5 prior to approval by the permitting authority.

SPECIFIC REQUIREMENTS

AI ID: 1468 - Rubicon LLC - Gelsmar Plant
Activity Number: PER200900003
Permit Number: 2261-V4
Air - Title V Regular Permit Renewal

UNF 0003 UNF003 - Aniline Complex

- 170 [LAC 33:III.517.B.1] Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.
- 171 [LAC 33:III.517.C] Submit supplementary facts or corrected information: Due promptly upon becoming aware of failure to submit or incorrect submittal regarding permit applications. In addition, provide information as necessary to address any requirements that become applicable to the source after the date of filing a complete application but prior to release of a proposed permit.
- 172 [LAC 33:III.517.D] Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III.Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.
- 173 [LAC 33:III.535] Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]
- 174 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.
- 175 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
- 176 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
- 177 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.
- 178 [LAC 33:III.5901.A] Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 179 [LAC 33:III.5907] Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessments of the substances, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.
- 180 [LAC 33:III.5911.C] Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.
- 181 [LAC 33:III.919.D] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES**

STATEMENT OF BASIS¹

PROPOSED PART 70 OPERATING PERMIT 2261-V4

**ANILINE COMPLEX
RUBICON LLC
GEISMAR, ASCENSION PARISH, LOUISIANA
Agency Interest (AI) No. 1468
Activity No. PER20090003**

I. APPLICANT

The applicant is: Rubicon LLC
PO Box 517
Geismar, LA 70734-0517

Facility: Aniline Complex

SIC Code: 2869

Location: 9156 Highway 75, Geismar, LA 70734

II. PERMITTING AUTHORITY

The permitting authority is: Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

III. CONTACT INFORMATION

Additional information may be obtained from:

Mr. Fritz Hurst
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313
Phone: (225) 219-3125

IV. FACILITY BACKGROUND AND CURRENT PERMIT STATUS

Rubicon LLC is a chemical manufacturer of a variety of organic and inorganic chemicals at their Geismar Facility and has been in operation since 1966. Aniline Complex consists of the Nitrobenzene I, Nitrobenzene II, Aniline II, and Aniline III production units. The facility currently operates under Permit No. 2261-V3, issued on July 9, 2008. This will be the Renewal/Modification Part 70 permit for the Rubicon Complex.

¹ 40 CFR 70.7(a)(5) and LAC 33:III.531.A.4 require the permitting authority to "provide a statement that sets forth the legal and factual basis for the proposed permit conditions of any permit issued to a Part 70 source, including references to the applicable statutory or regulatory provisions."